



LLC-FZ Anti-Corruption and Anti-Bribery Policy





1. Purpose

Silk Mile LLC-FZ ("Silk Mile" or "the Company") is committed to conducting all of its business activities with the highest ethical standards and in compliance with all applicable anti-corruption and anti-bribery laws, including but not limited to the UAE Federal Law, UK Bribery Act 2010, U.S. Foreign Corrupt Practices Act (FCPA), and relevant national laws in Egypt, Saudi Arabia, and Lebanon.

The purpose of this policy is to:

- Prevent corruption and bribery in all business dealings and operations.
- Provide clear guidance on expected conduct for all employees, agents, subcontractors, and business partners.
- Establish controls to ensure compliance with anti-corruption legislation.

2. Scope

This policy applies to:

- All employees, officers, and directors of Silk Mile LLC-FZ and its subsidiaries.
- Contractors, subcontractors, freight agents, customs brokers, consultants, and third-party representatives.
- Joint venture partners, suppliers, and customers where applicable.

3. Definition of Corruption and Bribery

- Bribery involves offering, promising, giving, requesting, or receiving anything of value to influence a business or governmental decision improperly.
- Corruption is the abuse of entrusted power for private gain and includes bribery, facilitation payments, kickbacks, embezzlement, and fraud.

4. Prohibited Conduct

Silk Mile strictly prohibits the following actions under all circumstances:

- Offering or accepting bribes, gifts, or facilitation payments to or from public officials or private entities.
- Using company funds or resources to influence business outcomes or government decisions.
- Engaging in or authorizing corrupt payments or benefits through third parties.
- Concealing or falsifying accounting records to cover up improper payments.
- Failing to report suspected bribery or corruption.



5. Gifts, Hospitality, and Entertainment

- Modest, culturally appropriate gifts and hospitality may be acceptable only if:
 1. They are not given to obtain or retain business or to gain an improper advantage.
 1. They are in accordance with local customs and company policy.
 2. They are not excessive, frequent, or in cash.
 3. They are transparently recorded in Silk Mile's books and records.

6. Third-Party Due Diligence

Silk Mile conducts strict due diligence on all subcontractors, agents, freight forwarders, and customs brokers. This includes:

- Background and reference checks.
- Reviewing compliance records and certifications.
- Signing anti-corruption declarations and codes of conduct.
- Ongoing monitoring and audit rights as part of contractual agreements.

7. Political and Charitable Contributions

- Contributions to political parties or campaigns on behalf of Silk Mile are strictly prohibited.
- Charitable donations must be transparent, approved by management, and not used as a cover for corrupt payments.

8. Record-Keeping and Transparency

- All financial transactions must be accurately recorded and supported with proper documentation.
- Employees must not make or accept off-the-books accounts or false entries.
- Internal audits are conducted regularly to ensure compliance.

9. Training and Communication

- Mandatory anti-corruption training is provided to all employees and relevant third parties.
- This policy is made available in local languages and regularly reviewed.
- Questions or concerns should be directed to the Compliance Officer or General Manager



10. Reporting and Whistleblowing

- Employees and partners are encouraged to report any suspected violations in good faith.
- Reports can be made confidentially to: hr@silk-mile.com or on the website.
- Retaliation against whistleblowers is strictly prohibited.

11. Violations and Disciplinary Action

- Violations of this policy will lead to disciplinary action, including termination of employment or contract, and may result in civil or criminal prosecution.
- The Company reserves the right to terminate any relationship with third parties found to have engaged in corrupt practices.

12. Governance and Review

This policy is approved by Silk Mile senior management and is reviewed annually or as required by changes in legislation or business operations.