



# Anti-Bribery / Anti-Corruption Policy Statement

[info@2rivers-group.com](mailto:info@2rivers-group.com)  
[www.2rivers-group.com](http://www.2rivers-group.com)

2Rivers is fully committed to upholding ethical business practices and international standards, complying with applicable laws, statutes, regulations, and codes relating to anti-bribery and anti-corruption in all jurisdictions where we operate, including the United States Foreign Corrupt Practices Act (FCPA), the EU Anti-Corruption Directive, the UK's Bribery Act 2010, Switzerland's Federal Act on Unfair Competition (UCA) and the UAE's Federal Law No. 31 of 2021 (UAE Penal Code) and Federal Decree-Law No. 20 of 2018 and applicable frameworks set out by the OECD Anti-Bribery Convention on Combating Bribery of Foreign Public Officials in international business transactions and the United Nations Convention Against Corruption to the extent that they relate activities of our company.

2Rivers takes a zero-tolerance approach to the giving and receiving of bribes, corruption, or fraud in any form. Through continuous improvement and diligent implementation of our policy guidelines, we strive to maintain the highest standards of integrity and transparency in business operations, contributing to the global effort against corruption and bribery.

Non-compliance with the policy, whether suspected or actual, and /or any indication of bribery or corruption will lead to an immediate internal investigation that may result in disciplinary action.

## Commitment

- All employees are strictly forbidden from engaging in any activity, practice, or conduct that would constitute a legal or regulatory violation under anti-corruption and anti-bribery laws, regulations, or international conventions.
- We respect and implement the procedures and mechanisms outlined in the policy to assess and minimize any risks related to corrupt or bribery behavior.
- We conduct regular training sessions to ensure that all employees are aware of the anti-bribery and corruption policy guidelines.
- We carry out regular reporting and monitoring to ensure compliance with the policy.
- We ensure enhanced due diligence procedures for existing and new business clients, partners, and suppliers.
- We regularly revise our existing policies to reflect changes in corruption and bribery regulations and legislation.

## Gifts and Hospitality

The exchange of gifts and hospitality, such as accommodation, travel expenses, and other reasonable, proportionate, and transparent activities, play an important role in maintaining long-term business relations and are treated as customary in some parts of the world, specifically during festivities. However, 2Rivers strictly opposes using such activities to improperly influence business decisions, unethical practices, or create a conflict of interest. We carry out activities lawfully, maintaining transparency through reporting and record-keeping.

Under our Gift, Entertainment, and Hospitality policy, cash gifts are prohibited. 2Rivers has established reporting guidelines for employees, and gift registers must be maintained as part of compliance procedures to ensure that gifts above reasonable value are recorded or even approved before acceptance. If either the recipient or provider is a Government Official, then prior approval must be obtained from the Compliance Department, irrespective of the value of the gift, entertainment, and hospitality.

Our policy strictly prohibits 2Rivers employees from performing or accepting financial favours with the intention of influencing a decision, judgment, or performance for any personal or corporate gain or interest.

## Guidance

- Transparency: To ensure transparency, we keep records of all acts of hospitality, including accepting or sending gifts.
- No obligation: After exchanging gifts or hospitality, the recipient is under no obligation to act favorably or to return any favor in business activities or decision-making.
- No expectations: Activities in relation to gifts and hospitality shall not create false expectations of importance or lead to any favors.
- Giving or receiving a gift should have a clear purpose: it should be an act of appreciation rather than motivated by personal or corporate interest or gain.
- Legality: All gifts must comply with the laws and regulations of the jurisdictions where they are sent and received.
- Gifts and hospitality expenses must be reported to Compliance and the direct hierarchy and documented.

- Financial limits: Compliance must approve giving or receiving a gift and/or hospitality with an estimated value above UAE 1000.

## Training and Monitoring

### Communication

- This policy is communicated to all staff. Each individual working for 2Rivers is responsible for being knowledgeable and adhering to this policy.

### Training

- We regularly train employees to ensure they understand and comply with our internal policy and relevant legislation. During training sessions, staff learn to identify, report, and be aware of potential bribery incidents and corruption risks.

### Monitoring

On an annual basis, 2Rivers monitors and reviews the policy's implementation to ensure its effectiveness and implement new changes when necessary.

The periodic review covers the following:

- Effectiveness of the policy
- New developments in relevant legislation and regulations
- Compliance with the policy guidelines
- Staff training
- Gift and hospitality reporting

## Confidential Reporting

Employees of 2Rivers who suspect a breach of policy measures, become aware of suspicious activities or suspect any form of misconduct must immediately and confidentially report their suspicions to our compliance department. 2Rivers treats all reports confidentially and conducts thorough investigations. The Whistleblowers are protected, and there is strict no-retaliation approach towards the reporter of event under investigation to ensure compliance with the policies without any fear of any adverse consequences and takes no disciplinary action against the person reporting. 2Rivers is committed to ensuring its Employees and parties they deal with to speak up with confidence, without fear of retaliation, if they have any concerns.