



Anti-corruption and bribery policy

Foxway Group: Anti-corruption and bribery policy

This Policy apply to all employees of Foxway Group including all its subsidiaries and its affiliates (in the following "Foxway").

Anti-Corruption and improper payments

Foxway opposes all forms of improper payments – that is, giving or receiving something of value to influence a decision or a transaction. Employees and representatives are strictly prohibited from offering or receiving valuable gifts, travels, kickbacks, illegal payments and any offer of items of value that may inappropriately influence or reward a customer, supplier or business partner to order, purchase or use our products and services. This applies irrespective of whether such gifts are provided directly, indirectly through a third party, such as an agent, supplier, business partner or consultant, or in the form of a sponsorship or a charitable contribution. Facilitation payments – small payments or gifts made to government officials for the performance of a routine government action – are regarded as bribes and strictly prohibited.

The areas where corruption, including bribery, can most often occur include:

- + Gifts and Entertainment
- + Facilitation Payments
- + Donations

It is the responsibility of Foxway personnel to be aware of how these situations may violate or lead to a violation of this policy.

Gifts and Entertainment

Gifts and hospitality are commonly offered as gestures of gratitude or tokens of appreciation. Foxway permits these tokens and gestures when they are appropriate, proportionate, made in good faith and in accordance with the Foxway code of conduct and this policy.

Examples of gifts and entertainment include the receipt or offer of gifts, meals or items with a value below the thresholds authorized by law, and invitations to events, functions or other social gatherings related to the Foxway business.

However, this policy and anti-corruption laws prohibit the provision or acceptance of money or anything of value for corrupt or improper

purposes. Therefore, Foxway personnel must at all times ensure that any gifts or entertainment are of a value that is legally permissible and will never be interpreted as an attempt to influence a decision or action.

Foxway personnel must always ensure that the giving of a gift or entertainment or any other benefit does not violate local laws or policies applicable in the country where the recipient is located. Countries have explicit limits on the value of gifts, entertainment or other benefits that a recipient may accept. This policy prohibits gifts in the form of cash or instruments that can be easily converted to cash in all cases.

Process ("Facilitation") Payments

Facilitation payments are prohibited by this policy and should not be made. Such payments will also typically breach anti-corruption Laws. If you are unclear on whether a payment may be a facilitation payment rather than a legitimate official fee, please consult your manager.

Donations

Foxway does not provide financial or any other kind of support or assistance to individual politicians, candidates, political parties or institutions. Neither the Foxway name nor any resources controlled by Foxway can be used to promote the interests of political parties or candidate. Employees participating in political activities will be granted leave from their work in accordance with the law and agreements.

Foxway believes in contributing to the communities in which it does business and permits donations to aid agencies, charities and other recipients. All such contribution should always be approved from Foxway Group to ensure that the donations is in accordance with this policy and not violating any anti-corruption laws.

Policy information

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