



Anti-Bribery & Anti-Corruption Policy

Dear Team,

This Policy reinforces Maxwell Logistics's unwavering commitment to ethical conduct and integrity, particularly concerning our [Anti-Bribery and Anti-Corruption \(ABAC\) Policy](#). We have a **zero-tolerance policy** for bribery, corruption, and any form of improper payment or advantage in all our business dealings.

Purpose:

To ensure Maxwell conducts all business honestly, ethically, and in full compliance with anti-bribery and anti-corruption laws, with zero tolerance for any corrupt practice.

Scope:

Applies to all employees and personnel working for or on behalf of Maxwell.

Key Policy Points:

- Zero tolerance for bribery and corruption in any form.
- No employee or third party may offer, give, request, or accept bribes or improper advantages influencing business decisions.
- Maxwell must act with integrity, fairness, and professionalism at all times.

Procedure Highlights:

- Bribery includes offering, giving, receiving, or soliciting anything of value to influence actions.
- Corruption is strictly prohibited, whether direct or through third parties.
- Employees must never:
 - Engage in bribery, improper payments, or kickbacks.
 - Offer gifts or hospitality to officials expecting favors.
 - Accept gifts implying obligation.
 - Make facilitation payments.
 - Ignore or fail to report suspected bribery.
- External consultants/suppliers must also be made aware of this policy.

Training & Awareness:

- New employees receive induction training.
- Existing employees receive periodic communication or training.

Reporting & Consequences:

- Employees may confidentially report suspected bribery.

- HR/Management will investigate and take disciplinary action.
- Violations may lead to warning letters, termination, or removal from operations.

Review:

- Policy is reviewed annually or when operational changes occur.