

Anti-Bribery & Anti-Corruption Policy

Standard: Zero tolerance approach

Applies To: All employees and personnel working for or on behalf of Maxwell

1. Purpose

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

2. Scope

This policy applies to all employees and personnel working for or on behalf of Maxwell, including third parties acting in an official capacity, such as consultants, agents, and suppliers.

3. 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 that influence business decisions.
- Maxwell must act with integrity, fairness, and professionalism at all times.

4. Procedure Highlights

4.1 Definitions

- Bribery includes offering, giving, receiving, or soliciting anything of value to influence actions improperly.
- Corruption is prohibited whether direct or through third parties.

4.2 Prohibited Conduct

Employees must never:

- Engage in bribery, improper payments, or kickbacks.

- Offer gifts or hospitality to officials expecting favours.
- Accept gifts that imply obligation.
- Make facilitation payments.
- Ignore or fail to report suspected bribery.

4.3 Third-Party Compliance

External consultants, suppliers, agents, and partners must be made aware of and comply with this policy.

5. Training & Awareness

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

6. 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.

7. Review

This policy is reviewed annually or when operational changes occur.
