	DYARCO INTERNATIONAL GROUP (W.L.L)	
Approved By : GCEO Prepared By : MR	Anti-Bribery and Corruption Policy Statement	Doc. No. : DIG/QM/ABP Revision : 01 Date of Issue : 17-08-2025

At Dyarco International Group (Dyarco), the way of doing business is critically important to achieve its strategic objectives. Through Anti-Bribery and Corruption Policies (the Policy), Dyarco and its employees acknowledge that bribery and corrupt practices are unethical and prohibited. Therefore, Dyarco takes a zero-tolerance approach to any form of bribery and corrupt practices and consequently implements effective policies, procedures, systems and controls to counter the risk of bribery and corruption.

Purpose:

The purpose of this Policy Statement is to outline a summary of Company's risks, key rules, objectives and principles in which employees of Dyarco and its subsidiaries shall adhere to in order to maintain high ethical standards, to prevent and combat bribery and corruption. It also seeks to raise awareness among employees and related third parties (i.e. vendors, service providers, contractors or customers) about consequences of bribery and corruption practices, so that they could uphold Dyarco's zero tolerance approach to bribery and corruption and avoid actions or activities that can negatively impact Dyarco's image and reputation.

Scope:


This Policy applies to all employees and contractors working in all departments, branches and subsidiaries of the Dyarco, including:

- Dyarco directors
- Dyarco permanent employees (both full- and part-time)
- Dyarco temporary employees
- Dyarco contractors
- Dyarco service providers
- Joint venture partners, and
- Third-parties acting on behalf of Dyarco

Responsibilities:

- The Group Vice Chairman (GVC) is responsible for approving and overseeing the implementation of Dyarco's Anti-Bribery and Corruption Policies.
- The Senior Management of Dyarco is responsible for implementing Dyarco's Anti-Bribery and Corruption Policies. Management at all levels are responsible for ensuring that employees are made aware of and understand contents of the Dyarco's Anti-Bribery and Corruption Policies and are given adequate and regular training. Senior Management shall communicate the zero tolerance approach to bribery and corrupt practices to all stakeholders i.e. suppliers, contractors, business partners at the onset of business relationship and as appropriate thereafter. The Senior Management may further delegate its role and responsibilities in accordance with the Company's Delegation of Authority Policies.




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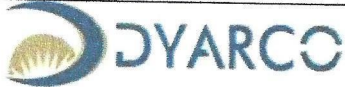
- Group Business Excellence Manager is responsible to conduct investigations on potential breaches of Dyarco's Anti-Bribery and Corruption Policies
- HR department: The Employee Handbook and QMS, which are read in conjunction with DYARCO Anti-Bribery and Corruption Policies. All existing employees receive regular, ongoing updates on how to implement and adhere to DYARCO Anti-Bribery and Corruption Policies.
- Employees: All employees shall abide by this Policy and do their best to ensure that the Company is protected against any regulatory, financial or reputational damage. All employees shall discharge their duties and responsibilities in compliance with this Policy and laws of the jurisdiction they operate in.

Key Principles:

Pursuant to this Policy Statement, following behaviors are prohibited for DYARCO employees.

1. Active Bribery: Employees shall never offer, promise, or pay bribes, including "facilitation payments", other improper payments that would unduly advantage a person.
2. Passive bribery: Employees shall refrain from requesting, soliciting, agreeing to receive or receiving a bribe from any person.
3. Kickbacks: Employees shall never collude with any person for a negotiated bribe in which a commission or other remuneration is paid to the bribe-taker in exchange for an advantage or other services rendered. Kickbacks typically encourage other party to cooperate in some illicit or illegal scheme.
4. Hospitality/Event Acceptance: Corporate hospitality and events offered to customers, suppliers, and business partners form part of the genuine commercial activities of Dyarco. However, hospitality can be used as a mean of bribery and corrupt practices when it is excessive and/or is designed to improperly influence the recipient(s). Any hospitality offered or provided shall not be intended to influence the recipient or any other person to act in an improper way or to influence a public official in the performance of his/her official duties.
5. Gift Acceptance: Employees may accept modest gifts or entertainment from clients or suppliers (up to a permissible limit of QAR 350) provided that the gift or entertainment is declared to and approved by the Reporting Manager & Group Chief Executive Officer (GCEO).
6. Political and Charitable Acceptance: A political or charitable contribution is prohibited if it:
 - Provides a direct/ indirect benefit (financial or otherwise) to a person who has requested or suggested it;
 - is provided to elected officials or individual members of political parties or organizations; or
 - Is effectively a disguised bribe.
7. Facilitation Payments: Employee shall not make facilitation payments. Facilitation payments are payments, large or small, made to government officials to secure or expedite routine or necessary official action, either more promptly or at all (e.g. custom clearance or issuance of visas).




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8. Business Travel: Business travel expenditures can be misused to disguise corrupt behavior, such as in case where an employee promises, offers, or provides business travel with the intention of receiving an improper benefits in return.

9. Marketing Sponsorships: All marketing sponsorships shall be reviewed and approved in accordance with the Delegation of Authority Matrix. Dyarco shall pay special consideration to sponsorships which provide the company opportunities to invite third parties to exclusive entertainment events as such activities may create the risk of appearance that they will be used to improperly influence the award/retention of business or other advantage.

Amendment History

Rev No.	Date	Amendment details
00	16-02-2022	Initial Issue
01	17-08-2025	<ul style="list-style-type: none"> Updating the role of 'Senior Officer- Business Excellence' to 'Group Business Excellence Manager under 'Key Responsibilities' section. Modified the section of 'GIFT ACCEPTANCE' to replace approver -GHRM to GCEO.

