



Anti-Bribery Policy

Albert Invent is committed to conducting its business with the highest ethical standards and in compliance with all applicable anti-bribery and corruption laws, including the U.S. Foreign Corrupt Practices Act, 1977 (FCPA), the UK Bribery Act, 2010 (UKBA), and other relevant legislation in each country where we operate. This Anti-Bribery Policy outlines our commitment to preventing bribery and corruption in all aspects of our business.

Prohibition of Bribery:

Albert Invent strictly prohibits any form of bribery or corruption, whether direct or indirect, including but not limited to:

- a) Offering, promising, giving, or authorizing bribes, kickbacks, or improper inducements to any individual or entity, including government officials, customers, suppliers, or any other business counterparties.
- b) Soliciting or accepting bribes or improper benefits from any individual or entity in exchange for business advantages or preferential treatment.
- c) Engaging in facilitation payments, which are small payments made to expedite routine governmental or administrative processes.

Compliance with Laws and Regulations:

We are committed to complying with all applicable anti-bribery and corruption laws, including federal, regional, provincial, state, and local laws and regulations in each country in which we do business. Employees must familiarize themselves with these laws and regulations and ensure strict adherence.

Gifts, Hospitality, and Entertainment:

Albert Invent recognizes that the provision of reasonable and proportionate business gifts, hospitality, and entertainment is a common business practice. However, such activities must not be used as a means to improperly influence business decisions.

Employees must exercise caution and good judgment when offering or accepting gifts, hospitality, or entertainment, ensuring they are modest, transparent, and in line with legal and ethical standards.

Prior approval must be sought from the appropriate authority in line with Albert's Giving and Receiving Policy for any gifts, hospitality, or entertainment that exceeds predefined thresholds or may create a conflict of interest.

Due Diligence and Third Parties:

We undertake thorough due diligence when engaging with third parties, such as agents, consultants, suppliers, distributors, and business partners, to assess their integrity and compliance with anti-bribery laws.

Contracts with third parties must include anti-bribery and corruption provisions, ensuring their commitment to compliance.

Regular monitoring and audits of third-party relationships are conducted to detect and prevent any improper conduct.

Record Keeping:

Accurate and transparent record-keeping is essential in demonstrating compliance with anti-bribery laws.

Employees must maintain complete and accurate records of all transactions, expenses, and interactions with external parties, including gifts, hospitality, and entertainment.

Falsification, alteration, or destruction of records is strictly prohibited.

Reporting Violations and Protection:

Employees must promptly report any concerns, suspicions, or violations of this Anti-Bribery Policy through designated channels.

Whistleblower protection is provided to individuals reporting in good faith, and retaliation against whistleblowers is strictly prohibited.

Training and Awareness:

Regular training and awareness programs are conducted to educate employees on anti-bribery laws, policies, and procedures.

Employees must complete the required training and acknowledge their understanding of their obligations under this policy.

Compliance Monitoring and Review:

Compliance with this Anti-Bribery Policy is subject to periodic reviews and assessments.

Internal controls and audits are conducted to ensure adherence to the policy and identify areas for improvement.

The policy is reviewed and updated as necessary to reflect changes in laws, regulations, or business practices.

Consequences of Violations:

Violations of this Anti-Bribery Policy may result in disciplinary action, including but not limited to termination of employment, contract termination, or legal proceedings, as appropriate.

This policy is applicable to all employees, contractors, consultants, agents, and representatives of Albert Invent.