

## ANTI-BRIBERY AND ANTI-CORRUPTION POLICY

### Introduction

Our objective is to establish a corporate culture in dealing with bribery, corruption and business gifts; and to provide a common framework for the above objectives.

### Definitions

**Corruption** is the misuse of the authority for the purpose of gaining a personal advantage directly or indirectly

**Business gift** is any good or service of value that is offered or received, in the context of a business relationship, for which the recipient does not pay the fair value of the related good or service. Business gifts include, but not limited to – goods, services, entertainments, travels, meals, etc.

**Bribery** is the offer, promise or payment to a person in a position of trust to influence that person's view or conduct.

Bribery and corruption may occur in various ways, among those: cash payments, political or other donations, kickbacks, social benefits, gifts, hosting, reimbursement of expenses and similar.

### Awareness and Principles

The Fine Gold's has a zero tolerance to any type of briberies and corruption. Accepting bribes or bribing can never be accepted under any purpose. Business relationships with 3<sup>rd</sup> parties wishing to get business from Fine Gold through bribery have to be terminated. It is unethical and illegal for business, their management and employees to offer gifts with a view to improperly influence those persons in order to obtain some benefits and results. Likewise, it is as unethical and potentially illegal to accept such gifts.

There are international laws combating bribery and corruption, particularly with respect to government officials. Fine Gold is conducting its business in compliance with such laws.

Fine Gold employees are strictly prohibited from offering, paying, promising any bribe, kickback, gift to any governmental official, customer or business associate, directly or indirectly, to secure any advantage for Fine Gold interests.

Similarly, all employees must follow a no-gift policy, where no gifts of any kind will be accepted from suppliers, customers, potential employees and suppliers, which may try to get an advantage from Fine Gold employee and his position in the company.

In cases which are or could be in breach of policy, the matter will be reviewed by the management and necessary sanctions can be applied.

