



Anti-Corruption Policy

Approved by the Board of Directors

This is a summary version of Probi's internal policy. This document only presents the main objectives of the policy.

The **Probi Anti-Corruption Policy** aims to prevent, deter, and detect corruption in all areas of Probi's operations. It provides clear guidelines for employees, representatives, and business partners to ensure compliance with anti-corruption laws.

Key Points:

1. **Objective:** The policy outlines Probi's commitment to ethical business practices, ensuring compliance with anti-corruption laws to avoid illegal advantages or unethical behavior in public or private sectors.
2. **What is Corruption?:** Corruption involves improper payments, offers, or promises made to influence someone's professional duties for undue business advantages. This includes bribes in the form of money, gifts, services, or favors.
3. **Expected Conduct:**
 - Bribery or receiving undue benefits is strictly prohibited.
 - Interactions with public officials and entities must adhere to higher scrutiny to avoid conflicts of interest.
 - Hospitality, gifts, and corporate events are subject to strict guidelines—no lavish, inappropriate, or untimely offerings are allowed.
4. **Third Parties:** Business partners, including agents and distributors, must comply with anti-corruption laws. Due diligence is required when entering agreements, and contracts must include anti-corruption clauses.
5. **Non-Compliance:** Violations of the policy or anti-corruption laws result in disciplinary action, including termination. Employees are protected when refusing to engage in corrupt activities.
6. **Reporting and Training:** Employees are encouraged to report suspicious behavior, and Probi provides anti-corruption training to ensure all staff understand their responsibilities.

The policy emphasizes transparency, ethical conduct, and strict adherence to legal and regulatory frameworks to maintain Probi's integrity in business.