


Anti-Corruption POLICY		DOCUMENT NUMBER:	
APPROVED BY: CEO 8 November 2018	RESPONSIBILITY: Audit & Risk Management Committee	SAN/POL-001	
	EFFECTIVE DATE: November 8, 2018	REVISION NUMBER:2 20/03/2021	
PUBLICATION STATUS: Public			
TITLE:	Anti-Bribery and Anti-Corruption Policy		
PREAMBLE:	<p>This anti-bribery policy exists to set out the responsibilities of Sanitary LLC employees and those who work for us in regards to observing and upholding our zero-tolerance position on bribery and corruption.</p> <p>It also exists to act as a source of information and guidance for those working for Sanitary LLC. It helps them recognize and deal with bribery and corruption issues, as well as understand their responsibilities.</p>		
Policy	<p>Sanitary LLC ,its employee, board member is committed to conducting business in an ethical and honest manner,and is committed to implementing and enforcing systems that ensure bribery is preventing. Sanitary LLC has zero-tolerance for bribery and corruption activities. We are committed to acting professionally,fairly,and with integrity in all business dealings and relationships,wherever in the country we operate.</p> <ol style="list-style-type: none"> 2. Any arrangements our company makes with a third party is subject to clear contractual terms,including specific provisions that require the third party to comply with minimum standards and procedures relating to anti-bribery and corruption. 3. All Sanitary LLC entities will ensure employees, board members, volunteers, and third parties that engage with company are made aware of the Anti-corruption Policy. 4. Corruption action will including termination of employment. Third parties who fail to comply with this policy will have their agreements and/or contracts with Sanitary terminated. 5. Board of Directors delegate responsibility to manage anti corruption actions to CEO. 		
SCOPE	Each entity in the Sanitary LLC will ensure that it implements this policy either by referencing it directly, or by adopting its own local policy which is in accordance with this policy and any management policy that supports it.		
DEFINITIONS	Corruption is defined as 'the abuse of entrusted power for gain' . It includes practices such as bribery, fraud, extortion, collusion and money laundering. It also includes an offer or receipt of any gift, loan, fee, reward, or other advantage to or from any person as an inducement to do something that is dishonest, illegal, or a breach of trust in the conduct of the organization's activities. This may include cash or in-kind benefits, such as free goods, gifts, and holidays, or special personal services provided for the purpose of an improper advantage or that may result in moral pressure to receive such an advantage. Occasional minor gifts and entertainment should be handled in accordance with the applicable Conflicts of Interest Policy or other related policies.		



Signature: 

Date: 20/03/2021