



Anti-Corruption and Anti-Bribery Policy

Integrity, transparency and fair business conduct

Company	EBI
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Prepared by	EBI
Approved by	Executive Management
Owner	Executive Management and Finance

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This policy defines EBI rules for preventing, detecting and sanctioning corruption, bribery, facilitation payments, excessive gifts, conflicts of interest and similar practices.

1. Purpose

- Prevent corruption, bribery and any improper advantage in EBI activities.
- Promote integrity in tenders, procurement, sales, partnerships and technical operations.
- Protect good-faith whistleblowers and ensure traceability of decisions.

2. Prohibited conduct

- Offering, promising, requesting or accepting bribes or improper advantages.
- Facilitation payments intended to accelerate or secure routine actions.
- Excessive gifts, hospitality, commissions or benefits that may influence a decision.
- Undeclared conflicts of interest and misuse of company assets or information.

3. Gifts and hospitality

- Gifts and hospitality must be modest, occasional, transparent and linked to a legitimate business purpose.
- Cash gifts and equivalents are prohibited.
- Any sensitive or high-value situation must be declared and approved before acceptance or offer.

4. Tenders and commercial integrity

- Commercial proposals must be based on transparent pricing, documented scope and fair competition.
- No confidential tender information may be obtained or used improperly.
- Technical evaluations, certifications and reports must reflect actual work performed.

5. Third parties

- Intermediaries, consultants, suppliers and partners must act with integrity.
- High-risk third parties may be subject to due diligence and contractual compliance clauses.
- Payments must correspond to real, documented and approved services.

6. Accounting and records

- Books, invoices, expense reports and payments must be complete, accurate and traceable.
- False descriptions, off-book accounts or undocumented payments are prohibited.

7. Reporting and protection

- Concerns may be reported to management, finance, compliance@ebi-gn.com or responsibility@ebi-gn.com.
- Good-faith reporters are protected from retaliation.
- Reports are reviewed confidentially and escalated where appropriate.

8. Sanctions

- Violations may lead to disciplinary action, contract termination, recovery measures and legal referral.
- Managers are responsible for enforcing this policy in their areas of responsibility.

Approval

Name	Robert TOUNKARA
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Position	Managing Director
Organization	EBI