

**PEAK INTERNATIONAL**  
**TRADING CO. L.L.C**  
**BRIBERY POLICY**

## **Introduction**

**PEAK INTERNATIONAL TRADING CO. L.L.C** is committed to conducting business fairly, honestly, and with integrity. We do not tolerate bribery or corruption in any form, whether committed by employees, contractors, or agents acting on our behalf. This policy sets out our expectations of all employees, contractors, and agents in relation to bribery.

## **Definition of Bribery**

Bribery is the offering, giving, receiving, or soliciting of any advantage, financial or otherwise, with the intention of influencing the behavior of another person. It can take many forms, including but not limited to:

- Cash or gifts of any kind
- Excessive entertainment or hospitality
- Kickbacks or secret commissions
- Favoritism in hiring, promotion, or awarding contracts
- Compliance

All employees, contractors, and agents must comply with this policy at all times. Failure to comply with this policy may result in disciplinary action, up to and including termination of employment or contract.

## **Gifts and Hospitality**

Our organization recognizes that giving and receiving gifts and hospitality is a normal part of business. However, such gifts and hospitality must be reasonable and proportionate, and must not be given or received with the intention of influencing the behavior of another person.

All gifts and hospitality given or received in the course of business must be recorded and approved by a manager.

## **Conflicts of Interest**

All employees, contractors, and agents must avoid conflicts of interest that may arise between their personal interests and the interests of our organization. This includes situations where a personal relationship or financial interest could influence a decision made on behalf of our organization.

## **Reporting**

All employees, contractors, and agents have a responsibility to report any concerns or suspicions of bribery or corruption. Reports can be made to a manager or through our whistleblower policy.

## **Training**

All employees, contractors, and agents will receive training on this policy and the risks of bribery and corruption. Training will be provided on a regular basis to ensure that all employees, contractors, and agents are aware of their obligations under this policy.

## **Review**

This policy will be reviewed regularly to ensure that it remains effective and relevant to the needs of our organization.

This policy is effective from the date of approval and supersedes all previous policies on bribery and corruption.

