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## Anti-Corruption Policy for Equilibria Ltd - Consultancy and Research Firm

### 1. Introduction

At Equilibria Ltd, we prioritize the highest standards of integrity, transparency, and ethical behavior. This comprehensive Anti-Corruption Policy underscores our firm's firm stance against any form of corruption and bribery in all facets of our consultancy and research operations. Our commitment extends to fostering a culture of ethical conduct not only within our organization but also in our interactions with clients, partners, and stakeholders. This policy serves as a guiding framework to prevent and identify corrupt practices, thereby ensuring the trust and confidence of our clients and the public.

### 2. Definitions

- a) Corruption: Refers to any misuse of power, authority, or position for personal gain or to gain an unfair advantage.
- b) Bribery: Encompasses the act of offering, promising, giving, accepting, or soliciting anything of value to influence the decisions or actions of an individual in their official capacity.

### 3. Commitment to Anti-Corruption

**Equilibria Ltd is fully committed to:**

- a) Strictly adhering to all relevant anti-corruption laws and regulations applicable in the countries where we operate.
- b) Prohibiting all forms of corruption, including bribery, extortion, and embezzlement, by anyone representing our firm.

c) Conducting all business dealings with utmost honesty, integrity, and fairness.

#### **4. Prohibited Conduct:**

**Equilibria Ltd vehemently prohibits the following corrupt practices:**

a) Offering, giving, promising, or soliciting bribes, kickbacks, or any other improper incentives to any individual, whether they are public officials or private individuals, to influence their actions or decisions.

b) Engaging in or facilitating money laundering or any unlawful financial transactions.

c) Participating in fraudulent or deceptive practices related to financial reporting or any other business operations.

d) Accepting or providing lavish gifts, hospitality, or any other benefits that could be misconstrued as attempts to influence business decisions.

#### **5. Gifts and Hospitality**

We recognize that exchanging gifts and hospitality is a customary practice in business.

However, Equilibria Ltd has implemented stringent guidelines to ensure that such exchanges do not lead to corrupt practices:

a) Gifts and hospitality should be appropriate and reasonable, without creating obligations or expectations of reciprocation.

b) Employees are required to disclose any gifts or hospitality received or offered to clients, partners, or stakeholders if their value exceeds the specified threshold set in our policy.

#### **6. Due Diligence**

Equilibria Ltd places significant emphasis on conducting comprehensive due diligence on all clients, partners, and stakeholders to identify and prevent any association with individuals or organizations involved in corrupt practices.

#### **7. Reporting and Whistleblowing**

We actively encourage all employees, consultants, and stakeholders to report any suspicions or instances of corruption or bribery through the designated channels. Whistleblowers will be

safeguarded against any retaliation, and all reports will be treated confidentially and investigated promptly.

## **8. Training and Awareness**

Equilibria Ltd prioritizes regular training and awareness programs to educate our employees and consultants about anti-corruption laws, policies, and procedures.

## **9. Enforcement and Consequences:**

Any violation of this Anti-Corruption Policy will be met with appropriate disciplinary action, which may include termination of employment or contract. In severe cases, violations may be reported to relevant authorities.

## **10. Continuous Improvement:**

We are dedicated to continually improving our anti-corruption efforts. This policy will undergo periodic review and updating to align with evolving laws, best practices, and emerging risks.

## **11. Conclusion**

Equilibria Ltd's Anti-Corruption Policy is a testament to our unwavering commitment to conducting business with ethics and transparency. By adhering to this policy, we foster a corruption-free work environment and uphold the trust of our clients, partners, and stakeholders. Together, we contribute to a fair and ethical business ecosystem, working towards a brighter future for all.

Making our world more liveable

*Equilibria is a company aiming to promote the power of evidence-based ideas and solutions generated through research and consultancy to overcome diverse world issues and challenges*