

# Four Winds Saudi Arabia, Ltd.

" We move those who move the world "

Anti-Bribery, Anti-Money Laundering and Anti-Corrupt Practices Policy



## Introduction

Four Winds Saudi Arabia, Ltd. being legally recognized by the Saudi Arabian Government as per provisions of its business permit and licenses issued by the Ministry of Commerce and Investment is bound, but not limited to, the Saudi Arabian Government's laws and regulations in trade practices to which includes the implementation of anti-bribery, money laundering and corruption laws and regulations. With reference to the applicable provisions of the existing Royal Decrees and Council of Ministers Resolutions; Four Winds SA., Ltd, though a private institution, commits itself to allegiance with the promulgated laws and regulations against corruption applicable to its business dealings to both public and private sectors and entities in the Kingdom of Saudi Arabia but not limited to its local business transactions so to include international commercial activities encompassing private individuals and foreign trade partners.

Pursuant to this legal provisions, Four Winds SA., Ltd. adopts applicable policies in compliance with the following references:

- i. *Combating Bribery Law (CBL), Royal Decree No. M/36, dated 29/12/1412H corresponding to 30 June 1992; and*
- ii. *Civil Service Law, Royal Decree No. M/49, dated 10/7/1397AH corresponding to 26 June 1977; and*
- iii. *National Strategy for Protecting Honesty and Combating Corruption, Council of Ministers Resolution No.43, dated 1/2/1428AH corresponding to 19 February 2007; and*
- iv. *Money Laundering Law, Royal Decree No. M/39 of August 23,2003.*
- v. *United Nations Convention against Corruption.*

This internal policy against bribery, money laundering and corruption applies to all but not limited to individuals, private companies, government institutions, and foreign entities who is bound to a removal and/or facilitation agreement and or contract with Four Winds SA., Ltd. for the provision of services it is required of.

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## 1. DEFINITION OF TERMS

- 1.1. **BRIBERY** – Is the act of receiving or offering of undue reward or anything of value and includes payments to secure a business advantage, financial, contractual or otherwise, to which Four Winds Saudi Arabia, Ltd is not entitled. Anything of value can be a bribe, including a gift in kind or some other favor such as an offer of employment to a relative of the person being bribed. It will involve the giver and the receiver in the improper performance of a personal, company or official responsibility.
- 1.2. **CORRUPTION** – It can include graft, bribery, facilitation payments of other forms of improper business practice. It has the same attributes as set out under the bribery definition above. It can be summarized as the misuse of entrusted power or office, whether in the public or private sector, for private gain.

## 2. RESPONSIBILITIES OF FOUR WINDS SA., LTD MANAGEMENT AND EMPLOYEES:

- 2.1. To read, understand, acknowledge, and comply with the provisions of this policy;
- 2.2. To train all new workers with the provisions of this policy;
- 2.3. To ensure that all existing workers receive regular and relevant training on how to implement this policy;
- 2.4. To communicate the company policy to clients, business partners, suppliers and others alike (third party);
- 2.5. To detect, prevent, and report forms of bribery and corruption from within the company's system or from clients, corporate partners, and foreign or local entities;
- 2.6. To avoid engaging to activities that may lead to breach of this policy:

2.6.1. Engaging into under-the-table agreement with clients and performing services outside the approved daily work schedule.

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- 2.6.2. Receiving and/or collecting payment in a form of monetary and/or non-monetary value from clients in exchange of a favor and/or service rendered by Four Winds employee to a client beyond the approved scope of work.
- 2.6.3. moonlighting and accepting part-time jobs using the company identity and/or facilities.
- 2.6.4. Use of and/or indicating thereto on CC or BCC, personal email address and/or general or public email, in communicating business transactions and all other communications related to the conduct of business with clients, supply chain, partner agents and other related parties.
- 2.7. To report to the top management immediately any "feel" or "justified" case of bribery;
- 2.8. To keep financial records and have appropriate internal controls in which payments (outgoing/incoming) are made.
- 2.8.1. Invoices must be issued using Four Winds official formulary with its official logo and corresponding unique invoice number.
- 2.8.2. Payments collected in favor of Four Winds has to be supported by Four Winds Official Receipt bearing the official company logo and corresponding unique receipt number.
- 2.8.3. Outgoing payments must observe proper initiation and approval procedures.
- 2.8.4. NO client payments are to be collected through any account numbers except the official Four Winds Saudi Arabia, Ltd. bank account details.

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- 2.9. To submit proper liquidations to concerned department any expenditures related to hospitality gifts or expenses as well as their reasonable justification/s
- 2.10. All accounts, invoices, memoranda and other documents and records relating to dealings with third parties, such as clients, suppliers and business contacts, should be prepared and maintained with strict accuracy and completeness. No accounts may be kept "off-book" to facilitate or conceal improper payments.

### 3. POLICY RATIONALE

Bribery is the act of offering, promising, accepting, giving, taking or soliciting of an advantage as an encouragement of action which is illegal or a breach of trust.

It is the Four Winds Saudi Arabia, Ltd’s policy to conduct all of its business in an honest and ethical manner. Four Winds Saudi Arabia, Ltd takes **zero-tolerance** approach to bribery, money-laundering, and corruption. As a prominent and sophisticated company, Four Winds Saudi Arabia, Ltd shall be committed to acting professionally, practically and with integrity in all its business wherever it is operating, executing and enforcing effective system to fight bribery.

Four Winds Saudi Arabia, Ltd will comply and uphold all laws relevant to countering bribery in all the jurisdictions in which it operates. However, Four Winds Saudi Arabia, Ltd shall remain bound by the laws and regulations of the Kingdom of Saudi Arabia, including Combating Bribery Law (CBL) and Money Laundering Law.

The following items further are enumerated to justify the need of this policy:

- 3.1. It is a must that Four Winds SA., Ltd. management and employees uphold the company's prevailing credibility and liability as a moving company;
- 3.2. Mandate the company's work force to adhere to the core of its work ethics being centered to honesty and respect;
- 3.3. To establish and maintain truthful business dealings with its clients by practicing non-tolerance (at all) to bribery and corruption;
- 3.4. Maintain professionalism in each and every one's scope of work;

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- 3.5. To stand against corruption and commit to report violations or of any probable sense of bribery;
- 3.6. To provide information to Four Winds SA., Ltd. employees regarding corruption and bribery for them to be able to recognize its forms, threats and disadvantages in order to come up with strategies on how to deal with corruption and bribery matters;
- 3.7. To make employees recognize the fact that being a company involved in international business dealings with foreign companies, Four Winds SA., Ltd. is as well subject to incrimination with respect to the international laws as well as the "per country" based charges imposed against bribery and corruption once involved in such practices;

#### 4. SCOPE

- 4.1. This policy governs business dealings within or outside the limits of Four Winds SA., Ltd so long the company's legal entity is in the front line. It may govern but is not limited to exchange of dealings between Four Winds SA., Ltd. employees and management with the following being collectively known as "**THIRD PARTY**":
  - 4.1.1. Actual clients/ customers
  - 4.1.2. Partner agents
  - 4.1.3. Supply chain
  - 4.1.4. Business contracts
  - 4.1.5. Company
  - 4.1.6. Company representatives
  - 4.1.7. Government/diplomatic offices and representative/s
  - 4.1.8. Any political institution and politicians
  
- 4.2. With no prejudice to level of authority and seniority, this policy applies to all employees – contractual or regular – as follows:
  - 4.2.1. Senior managers/ directors
  - 4.2.2. Department managers
  - 4.2.3. Area supervisors
  - 4.2.4. Ordinary employees

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- 4.2.5. Trainees/ volunteers/interns
- 4.2.6. Or any other persons associated with Four Winds SA., Ltd. in performing a job.
- 4.2.7. Supply chain
- 4.3. The following are prohibitions enclosed in this policy:
  - 4.3.1. Promises (verbally or in written), gifts, hospitality or favors offered propelled with an expectation of business advantage;
  - 4.3.2. Promises (verbally or in written), gifts, hospitality or favors from a government official, agent or representative to expedite a routine procedure;
  - 4.3.3. Any form of payment in a doubted intention of probable bribe;
  - 4.3.4. Threats of not accepting bribe from either the third party or an employee's co-worker;
  - 4.3.5. Facilitation payments "kick backs";
  - 4.3.6. Un-receipted payments especially those of considerable value;
  - 4.3.7. Any others that may be related but not limited to the nature of the above enumerations.
  - 4.3.8. Charitable contributions used as a scheme to conceal bribery.

**5. DELIMITATION**

- 5.1. Any given or received tolerable gifts of hospitality offered not to influence either parties to obtain or retain business or business advantage;
- 5.2. Any given or received gifts not intended to exchange of favors or benefits;
- 5.3. Any given or received gifts which are generally acceptable by the existing law governing the land;
- 5.4. Not cash or any monetary equivalent;
- 5.5. Customary gifts given in appropriate occasions;
- 5.6. A gift openly given and not through "under-the-table" hand-over; and

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- 5.7. Donations channeled to legally recognized institution/s
- 5.8. Charitable donations which are legal and ethical under local laws and practices.

**6. REPORTING VIOLATIONS**

- 6.1. Violations of any sort, issues, and suspicions must be reported to the top management the earliest time possible;
- 6.2. Doubts should be clearly described and discussed with the management prior to lodging a formal report;
- 6.3. A report may be in a form of writing and email indicating the name of the suspected violator and clear description of the suspected violation; and
- 6.4. The complaining party must indicate his/her full personal details and affix his/her name and signature in the report.

**7. PROTECTION**

- 7.1. Workers who refuse to accept or offer a bribe, or those who raise concerns or report another's wrongdoing, are sometimes worried about possible repercussions. It is then Four Winds SA., Ltd. top management responsibility to encourage openness and offer support to anyone who raises genuine concerns reported in good faith under this policy, even if they turn out to be mistaken; and
- 7.2. Four Winds SA., Ltd. is committed to ensure that no one suffers any detrimental treatment as a result of refusing to take part in bribery or corruption, or because of reporting in good faith their suspicion that an actual or potential bribery or other corruption offence has taken place, or may take place in the future. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavorable treatment connected with raising a concern.

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## 8. SANCTIONS AND DISCIPLINARY ACTIONS

- 8.1. Bribery and corruption are punishable for individuals by maximum penalty of 10 years imprisonment and a 1 million Saudi riyal fine;
- 8.2. Any employee who breaches this policy will be subject to disciplinary action not limited to internal measures but to include legal course of action prescribed by the laws of the land;
- 8.3. Depending on the gravity of the case, erring employee may be due for certain disciplinary action; and
- 8.4. Customers/clients, corporate partners and others alike may be charged of legal actions and possible revocation of binding contract

## 9. MONITORING AND REVIEW

- 9.1. The top management specifically the Chief Executive Officer, and General Manager will comprise the compliance authorities who shall implement and monitor the effectiveness of this policy; and
- 9.2. All employees are entitled of channeling their opinions and views regarding correction/s and probable improvements of this policy.

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## 10. ACKNOWLEDGEMENT

By signing in this document, the following items are understood and accepted:

1. I/we have read and been informed about the content, requirements, and expectations of this policy.
2. I/we have received a copy of the policy and agree to abide by the guidelines as a condition to employment at Four Winds and/or as a condition of engaging in business with the company.
3. I/we understand that if I/we have questions, at any time, regarding this policy, I/we will consult with the company management or to a Human Resources staff of Four Winds Saudi Arabia, Ltd.

NAME			
JOB TITLE			
COMPANY			
DATE		SIGNATURE	

### INSTRUCTIONS:

1. Address your queries and concerns to: [jed@fourwinds-ksa.com](mailto:jed@fourwinds-ksa.com)
2. Send back this signature page to your main person of contact at Four Winds, otherwise to [jed@fourwinds-ksa.com](mailto:jed@fourwinds-ksa.com)

The Four Winds Saudi Arabia, Ltd ABC charter implementing document is exhibited as Document number: FW FAIM-FD5.6 entitled: ABC CHARTER. It is distributed for acknowledgement by:

1. Four Winds employees
2. Supply chain
3. clients
4. other interested party (ies)

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