

ANTI-BRIBERY & ANTI-CORRUPTION POLICY (FCPA & UK Bribery Act Compliance)

1. Purpose

Delta International Recruitment Agency ("the Company") is committed to conducting its business with integrity, transparency, and the highest ethical standards. This Policy establishes the Company's zero-tolerance approach to bribery and corruption and ensures compliance with applicable anti-corruption laws, including the U.S. Foreign Corrupt Practices Act (FCPA), the UK Bribery Act 2010, and all applicable local laws.

2. Scope & Applicability

This Policy applies to all directors, officers, employees, recruiters, agents, consultants, contractors, intermediaries, and third parties acting on behalf of the Company.

3. Zero-Tolerance Policy

The Company strictly prohibits offering, giving, requesting, authorizing, or accepting any bribe, kickback, or improper benefit, directly or indirectly, to influence decisions, secure improper advantages, or obtain or retain business.

4. Government Officials

No improper payment or benefit may be offered to any government official, government-owned or controlled entity, political party, candidate for public office, or public international organization.

5. Facilitation Payments

Facilitation payments are strictly prohibited under all circumstances, regardless of local customs or practices.

6. Gifts, Hospitality & Business Courtesies

Gifts or hospitality may only be offered or accepted if they are reasonable, proportionate, lawful, transparent, and for legitimate business purposes. Cash or cash-equivalent gifts are strictly prohibited.

DELTA INTERNATIONAL RECRUITING AGENCY

Office No 10-17/3, 4th Floor Silk Business Center, Rahman Abad Stop Main Murree Road, Rawalpindi – Islamabad – Pakistan.

 +92-51-426-4154  +92-51-426-4155  +92-300-8910-222  info@ditrc.com

 www.ditrc.com | www.delta.com.pk

7. Third-Party Due Diligence

The Company conducts appropriate due diligence on third parties and includes anti-bribery and compliance obligations in contractual arrangements.

8. Financial Controls & Record-Keeping

All financial transactions must be accurately recorded, properly authorized, and supported by valid documentation. False or misleading records are prohibited.

9. Reporting & Whistleblowing

Employees and stakeholders are encouraged to report suspected violations in good faith. Reports are handled confidentially, and retaliation is strictly prohibited.

10. Oversight & Responsibility

Senior management is responsible for overseeing ethics and compliance and for periodic review of this Policy.

11. Violations & Disciplinary Action

Violations may result in disciplinary action, termination of employment or contracts, and reporting to relevant authorities where required.

12. Policy Review

This Policy is reviewed periodically and updated as necessary.

13. Commitment

Delta International Recruitment Agency is committed to ethical, lawful, and responsible business conduct at all times.

Approved by: Management

Effective Date: 16-07-2016

Policy Owner: Compliance & Governance Delta Management