

**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.

### **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**