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Anti-Bribery and Corruption Policy

Purpose

This policy outlines the commitment of Metalchem Kft. to prevent bribery and corruption in all business dealings and relationships.

1. Policy Statement

Bribery and corruption are illegal and unethical. We maintain a zero-tolerance approach. No employee, officer, or representative may offer, promise, give, request, or accept bribes in any form.

2. Definitions

- Bribe: Anything of value offered, to improperly influence a decision.
- Facilitation Payment: Small payments made to expedite routine processes — also prohibited.
- Third Party: Any individual or organization acting on behalf of the company, such as agents, consultants, suppliers, and business partners.

3. Prohibited Activities

- Offering or receiving money, gifts, hospitality, or favors in exchange for business advantage.
- Concealing payments through false invoices or documents.
- Making donations or sponsorships with the intent, to influence a decision-maker.

4. Gifts and Hospitality

Reasonable, proportionate gifts or entertainment are permitted only if they:

- Are not intended to influence business outcomes.
- Are compliant with local laws and company rules.
- Are recorded accurately in expense reports.

5. Due Diligence and Risk Assessment

We conduct risk-based assessments on third parties and partners. Background checks, contractual clauses, and monitoring processes are part of our anti-bribery controls.

6. Record Keeping

All financial records, invoices, contracts, and transactions must be accurate, complete, and transparent.

7. Reporting and Whistleblower Protection

Employees are encouraged to report suspected bribery or corruption confidentially via internal channels. Whistleblowers will be protected from retaliation.

8. Enforcement

Breaches of this policy will result in disciplinary action, including dismissal, contract termination, and reporting to authorities when required by law.