PAROLA

EXAMPLE – Anti-Corruption Policy

31 March 2024

PAROLA Services provides the following:

> User and technical reference documentation of database and communications software;
> Consultancy to implement management systems that conform to multiple standards.

PAROLA Services operate an Integrated Management System (IMS) that implements the following:

> Quality Management;
> Information Security Management;
> Anti-Corruption Management.

PAROLA Services will do the following:

> Maintain a **No-Blame Environment**, to encourage staff to reveal and jointly resolve issues;
> Comply with all applicable legal, contractual and other requirements and obligations;
> Continually improve the effectiveness of the IMS.

>> We will not, either directly or through a third party:
>>> Give or receive bribes or improper advantages;
>>> Give or receive facilitation payments;
>>> Give or receive any gift, hospitality, donation or benefit that may improperly influence a decision or impair independence or judgement.
>> We will not participate in any cartel.
>> We will not defraud or deceive anyone or act dishonestly.
>> We will not participate in any criminal activity, such as extortion, collusion, breach of trust, abuse of power, embezzlement, trading in influence or money laundering.

> **Conflicts of interest:** We will avoid, or deal appropriately with, situations in which our own interests could conflict with our obligations or duties.

> **Personnel and controlled organisations:** We will ensure that our workers, and organisations that we control, comply with this policy.

> **Business associates:** We only work with organisations and people that conform to standards consistent with our own.

Our Anti-Corruption Objectives are as follows:

(1) Ensure that NO worker who reports any concern subsequently suffers retaliation.

(2) Over 80% of workers score over 80% in compliance training comprehension tests.

(3) Over 80% of emails sent by Compliance receive replies that confirm comprehension.

(4) Over 90% of third parties are retained after annual review.

Implementation

> *Overall responsibility for implementation and review of this policy rests with senior management. However, all workers must adhere to and support this policy. We will inform all current and future workers about this policy and their role in its implementation.*

The management will review the following, at least once each year:

> The suitability of this policy;
> The objectives of this policy;
> Legal requirements and how we comply with them.