



“Maintaining integrity,
accountability, and
transparency standards in
all activities”



Updated on 31 Jan 2025

Application

This policy outlines the company's commitment to conducting its business ethically, legally, and transparently. The company prohibits any form of bribery, fraud, or corruption, whether involving public officials, private entities, or individuals. The company expects all its employees, directors, officers, contractors, consultants, agents, partners, and representatives to comply with this policy and the applicable laws and regulations in the countries where the company operates.



Definition

Bribery is the offering, promising, giving, accepting, or soliciting of any benefit, whether directly or indirectly, to or from any person or entity to influence their actions or decisions in favor of the company or to obtain or retain an improper advantage. Fraud is the intentional deception or misrepresentation of facts for personal gain or to cause loss or harm to others. Corruption is the abuse of entrusted power for private benefit.



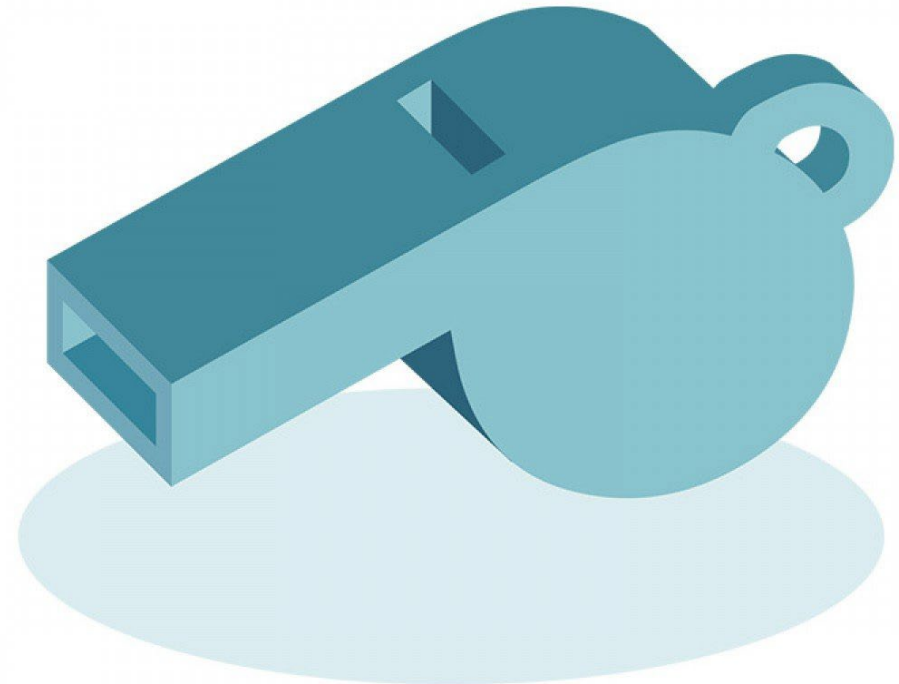
Zero Tolerance

GG International maintains zero-tolerance approach to bribery, fraud, and corruption. Any employee who engages in or facilitates such conduct will be subject to disciplinary action, up to and including termination of employment. The company may also report such behavior to the relevant authorities and cooperate with investigations. The company may also terminate its relationship with any third party violating this policy or engaging in unlawful or unethical conduct.



Reporting

- GG International requires all its employees and third parties to report any actual or suspected incidents of bribery, fraud, or corruption involving the company or its business activities. The company provides a confidential and anonymous reporting mechanism through its Ethics Hotline and encourages anyone concerned to raise it without fear of retaliation. The company will protect the identity and rights of anyone who reports in good faith and will not tolerate harassment, intimidation, or victimization.



Our complaints process



Our whistleblower officer based in Corporate HQ, Dubai is responsible for receiving, acknowledging, assessing, and investigating the reports promptly and professionally. The whistleblower officer will also provide regular updates to the whistleblower on the progress and outcome of the investigation, subject to legal and confidentiality constraints.



Our Commitment

GG International is committed to implementing and maintaining effective controls and procedures to prevent, detect and respond to bribery, fraud, and corruption risks. The company provides regular training and guidance to its employees and third parties on this policy and their responsibilities under it. The company also monitors and audits compliance with this policy and the applicable laws and regulations and reviews and updates this policy as necessary.