



ANTI-CORRUPTION AND ANTI-BRIBERY POLICY

The purpose of this Anti-Corruption and Anti-Bribery Policy is to ensure that UTP Group and its registered business units **Universal Tube and Pipe Industries FZE (UTP Pipe)** & **THL Tube and Pipe Industries LLC (THL Pipe)** operates with the highest standards of integrity, transparency, and ethical conduct in all of its business activities. This policy applies to all employees, directors, officers, contractors, suppliers, agents, and any other representatives of UTP Group (hereinafter referred to as "Employees") globally.

UTP Group is committed to conducting business free from corruption, bribery, and unethical practices. The policy outlines the Group's stance on corruption and bribery, and provides guidelines for Employees to ensure compliance with applicable laws and internal standards.

1. Definitions

Corruption: The abuse of power for personal gain, including any act of bribery, fraud, or other unlawful conduct to influence decisions for improper benefit.

Bribery: Offering, giving, receiving, or soliciting anything of value with the intention of influencing the actions of an individual or organization.

Facilitation Payments: Small payments made to secure or expedite routine governmental actions or decisions. These are prohibited under this policy.

Gift: Any item or favor given to an Employee or a third party, whether for personal use or in connection with their professional role.

2. Policy Statement

This policy prohibits:

- Offering, promising, giving, soliciting, or receiving bribes in any form.
- Offering or receiving gifts or entertainment that may influence business decisions.
- Making facilitation payments to expedite routine actions or decisions.
- Engaging in corruption or fraudulent activities, whether involving public or private sector entities.

3. Legal and Regulatory Compliance

Employees must comply with all relevant laws, regulations, and standards governing anti-corruption and anti-bribery practices, both in the UAE and in any jurisdictions including but not limited to Free Zone and Mainland, where UTP Group conducts business.



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This policy is consistent with the UAE's Anti-Corruption Law, the UAE Penal Code, and relevant international anti-corruption and anti-bribery standards, including the UK Bribery Act 2010 and the US Foreign Corrupt Practices Act.

4. Responsibilities of Employees

All Employees of UTP Group are required to:

- Act with integrity and avoid any behavior that may raise questions of ethical impropriety.
- Avoid conflicts of interest, and disclose any potential or actual conflict to their manager or the relevant internal body.
- Report any suspected incidents of bribery or corruption in accordance with the reporting procedures outlined in this policy.
- Refuse to engage in facilitation payments, regardless of whether local customs or practices condone such payments.

5. Gifts, Hospitality, and Entertainment

Gifts, hospitality, and entertainment may only be offered or accepted where they are:

- Modest in value.
- Not given with the intention of influencing business decisions.
- In compliance with local customs and applicable laws.

Employees must obtain prior approval from their line manager or HR before offering or accepting gifts, entertainment, or other forms of hospitality.

6. Reporting and Whistleblowing

Employees are encouraged to report any concerns about potential violations of this policy. Reports can be submitted to top management by emailing ceo@utpgroup.co.

Reports will be treated confidentially, and retaliation against employees who report concerns in good faith will not be tolerated. Any form of retaliation is itself a violation of this policy.

7. Monitoring, Enforcement, and Disciplinary Action

UTP Group will monitor compliance with this policy through regular audits and investigations. Any Employee found violating this policy may face disciplinary action, up to and including termination of employment, legal action, and reporting to relevant authorities.



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8. Training and Awareness

UTP Group will provide regular training to Employees to ensure they understand the implications of corruption and bribery and are equipped to comply with this policy. Training will include:

- Recognizing corruption and bribery risks.
- Understanding the legal implications of non-compliance.
- How to report suspected violations.

9. Policy Review and Updates

This policy will be reviewed annually and updated as necessary to ensure compliance with legal, regulatory, and business requirements.

10. Conclusion

UTP Group is committed to conducting business with integrity and transparency. By adhering to this Anti-Corruption and Anti-Bribery Policy, UTP Group ensures a high standard of ethical conduct that supports the Group's long-term success and reputation.

Signed By:

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Sumit Ghoshal
Chief Executive Officer

(Internal Use Only)

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Date: 13/12/2024	Date: 20/12/2024



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