PCL Imports Ltd. - Anti-Bribery and Anti-Corruption Policy

PCL Imports Ltd. is committed to conducting business in an ethical and honest manner and is committed to implementing and enforcing systems that ensure all forms of bribery, corruption, and fraud are prevented. The company has zero tolerance for bribery and corrupt activities. We are committed to acting professionally, fairly, and with integrity in all business dealings and relationships we build with our employees. The company will constantly uphold all laws relating to anti-bribery and corruption and adhere to the International Standard requirements in combating any form hereof.

Scope

This policy applies to all employees, managers, vendors & agents, business partners and owners of the company including temporary or contract employees. They must ensure that they do not become involved in any way in the payment of bribes. This policy sets out the minimum standards (Local anti-bribery regulations, or any other relevant legislation that might be applicable) to which all employees of the company must adhere at all times.

Definitions

Bribery can be described as: giving or receiving anything from any person including government officials (usually money, a gift, loan, reward, favour, commission, or entertainment), as an improper inducement or reward for obtaining business, employment or any other benefit.

Bribes can therefore include, but are not limited to:

- gifts and excessive or inappropriate entertainment, hospitality, travel and accommodation expenses;
- payments, whether by employees or business partners such as recruiters, labour service providers or consultants; and

- other 'favours' provided to supervisors, such as making unwanted advances, payments or promises.
- “Facilitating Payment” in cash or in kind, given to a government employee to expedite or secure the performance of a routine governmental action.

Company Commitment

All employees and business partners must adhere to the company ethos of anti-bribery and anti- corruption. No stakeholders will be allowed to take part or become involved in any form of bribery, corrupt behaviour, or fraud, including the following:

- Offer, pay, or give anything of value to any person through which one will unethically gain something in return which is not provided for in terms of their employment contract.
- Attempt to mislead or induce any person to do something illegal or which goes against the company policy.
- Mislead or intentionally lie to any person to gain an advantage above and beyond their employment agreement.
- Violate any rules by shifting blame or responsibility onto another employee/person.
- Fraudulent practices against the company ethos or legislation.

The company is committed to remove and combat any inappropriate behaviour immediately and will not tolerate such behaviour from employees, managers, or customers/clients in any way or form. This policy hereby binds the company to its commitment to regularly discuss and mitigate factors related to any form of bribery, corruption, or fraudulent behaviour.

Company Name	PCL Imports Ltd.
Approved By	Duane Carr
Company Stamp	
Date	11/10/2026