



ANTI-CORRUPTION POLICY

Purpose

At ALFA Development, we are committed to conducting business with a high level of ethics and professionalism. This Anti-Corruption Policy has been developed to ensure that all our business activities are carried out with integrity and in compliance with applicable laws and regulations.

The purpose of this policy is to provide a clear and transparent framework for ALFA Development's approach to corruption and bribery, and to describe how we identify and prevent corruption and bribery in our daily operations.

This policy applies to:

- All employees of ALFA Development
- External business partners, suppliers, and other actors within our value chain

We take a firm stand against any form of corruption, both internally and externally. The policy therefore applies to all activities across our value chain. We expect everyone representing ALFA Development to act with integrity and to comply with this policy.

Principles:

- **No Bribery or Undue Advantages**
It is prohibited to offer, promise, give, or receive gifts, cash, travel, or other benefits that may influence business-related decisions. Only gifts of symbolic value and in line with customary business practice are permitted. Gifts must never create dependency or an expectation of a quid pro quo.
- **Transparency and Reporting**
All transactions must be properly documented and traceable. Any suspicion of corruption must be reported immediately to the nearest manager or via the company's grievance mechanism. Reporting can be made without risk of retaliation.
- **Facilitation Payments**
ALFA Development does not accept facilitation payments, kickbacks, or extra payments for public or administrative services.
- **Sponsorships and Donations**
Only sponsorships and donations that support the company's values and business strategy are permitted.
As a general rule, donations and sponsorships may only be granted to institutions and organizations.

**Training and Continuous Awareness**

ALFA Development ensures continuous updates on applicable anti-corruption legislation in the countries where we operate. All employees receive training and onboarding on anti-corruption and ethical conduct.

Sanctions and Follow-Up

Violations of this policy may result in disciplinary action, and in serious cases termination of employment and reporting to law enforcement authorities.

This policy has been approved by ALFA Development's executive management and is published on the company's intranet and website. The policy is monitored and reviewed annually by management.

Employees and business partners are encouraged to report any suspicion of corruption or bribery either to their nearest manager or through ALFA Development's publicly available grievance mechanism. Inquiries can be submitted via the following [form](#)

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