

## **B-AMONG EVENTS & DÉCOR ANTI-BRIBERY AND ANTI-CORRUPTION POLICY**

**Business:** B-Among Events & Decor

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**Version:** 1.0

### **1. PURPOSE**

B-Among Events & Decor is committed to conducting its business with **integrity, transparency, professionalism and accountability.**

This Anti-Bribery and Anti-Corruption Policy establishes the standards of conduct expected from B-Among Events & Decor, its management, employees, representatives, consultants, suppliers, contractors and other persons acting on its behalf.

The Company has a **zero-tolerance approach to bribery, corruption, kickbacks, secret commissions and other improper payments or benefits.**

### **2. SCOPE**

This Policy applies to:

- Directors, management and employees of B-Among Events & Decor;
- Freelancers, consultants and event coordinators engaged by the Company;
- Suppliers, contractors and service providers;
- Agents, representatives and other third parties acting on behalf of the Company; and
- Any other person or entity involved in providing or procuring services for B-Among Events & Decor.

The Policy applies to all business activities, including event planning, event management, décor, procurement, supplier engagement, client engagements and referrals.

### **3. ZERO TOLERANCE FOR BRIBERY AND CORRUPTION**

B-Among Events & Decor shall not offer, promise, give, request, solicit, receive or accept any bribe or improper benefit, whether directly or through another person.

A bribe includes money, gifts, favours, services, employment opportunities, discounts, commissions, kickbacks or any other benefit offered or provided to improperly influence a business decision or obtain an unfair advantage.

**No employee, supplier, client, representative or third party may offer or receive a bribe on behalf of B-Among Events & Decor.**



#### 4. NO SECRET COMMISSIONS OR KICKBACKS

B-Among Events & Decor strictly prohibits **secret, undisclosed or unauthorised commissions and kickbacks.**

Employees, event planners, coordinators or representatives must not personally receive money, commissions, gifts, discounts or other benefits from:

- Venues;
- Caterers;
- Photographers and videographers;
- Entertainment providers;
- Decor suppliers;
- Tent, chair and furniture providers;
- Transport providers;
- Ushers and hospitality providers;
- Florists;
- Sound, lighting and production providers;
- Printers;
- Security providers; or
- Any other supplier or service provider introduced, recommended or engaged in connection with a B-Among client or event.

Where a supplier pays a legitimate referral or commission fee, it must be **fully disclosed, authorized by B-Among Events & Decor and appropriately documented.** No employee or representative may personally retain such payment unless expressly authorized in writing by the Company.

#### 5. NO CLIENT COMMISSIONS OR UNDISCLOSED BENEFITS

B-Among Events & Decor shall not charge or receive an undisclosed commission from a supplier in addition to the amount quoted to a client.

Where the Company receives a legitimate commercial benefit, referral fee or commission that relates to a client engagement, the arrangement must be transparent and appropriately disclosed where required.

The Company shall not recommend a supplier to a client solely because the employee or representative will personally benefit from that recommendation.

Supplier selection and recommendations shall be based on appropriate considerations such as:

- Quality;
- Reliability;
- Price and value;
- Availability;

- Experience;
- Professionalism;
- Suitability for the event; and
- Client requirements.

## 6. FACILITATION PAYMENTS

B-Among Events & Decor prohibits **facilitation payments**, meaning unofficial payments made to induce or speed up a routine service or administrative action.

Employees and representatives must not make unofficial payments to government officials, venue personnel, service providers or any other person to obtain preferential treatment.

Any unusual request for a payment should be referred to Management before payment is made.

## 7. GIFTS, HOSPITALITY AND FAVOURS

Reasonable and genuine business hospitality may be acceptable where it is:

- Appropriate and proportionate;
- Provided for a legitimate business purpose;
- Not intended to influence a decision improperly;
- Not excessive or frequent; and
- Consistent with this Policy.

Gifts, hospitality or favours must never be used to influence the award of a contract, supplier appointment, client decision or business opportunity.

Employees must not accept cash or cash equivalents from clients, suppliers or prospective suppliers.

Where there is doubt about whether a gift or hospitality is appropriate, the employee must seek guidance from Management.

## 8. CONFLICTS OF INTEREST

Employees and representatives must disclose any actual, potential or perceived conflict of interest.

A conflict may arise where an employee or representative:

- Has a personal or financial relationship with a supplier;
- Owns or has an interest in a supplier company;
- Will personally benefit from selecting a particular supplier; or



- Has a close personal relationship with a client or service provider that could influence a business decision.

A person with a conflict must not participate in the relevant decision unless authorised by Management.

## **9. PROCUREMENT AND SUPPLIER SELECTION**

Supplier selection must be conducted fairly, transparently and professionally.

Employees must not:

- Manipulate quotations to favour a particular supplier;
- Request or accept personal benefits in exchange for awarding work;
- Disclose confidential competitor quotations for personal gain;
- Create false supplier quotations;
- Inflate supplier costs for personal benefit; or
- Direct business to a supplier in exchange for a secret commission or kickback.

B-Among Events & Decor reserves the right to discontinue relationships with suppliers who engage in bribery, corruption or unethical business practices.

## **10. CLIENT FUNDS AND COMPANY FUNDS**

All client and Company funds must be handled honestly and accounted for appropriately.

Employees and representatives must not:

- Misappropriate client funds;
- Create false invoices or receipts;
- Inflate expenses for personal benefit;
- Divert payments to personal accounts;
- Make unauthorized deductions; or
- Conceal payments, commissions or expenses.

All payments should, where reasonably practicable, be supported by appropriate documentation and made through approved payment channels.

## **11. RECORD KEEPING**

B-Among Events & Decor shall maintain accurate and reasonable records of financial transactions, supplier payments, commissions, expenses and other business-related payments.

No employee or representative shall create or maintain false, misleading or incomplete records for the purpose of concealing an improper payment or benefit.

## 12. THIRD-PARTY REPRESENTATIVES

B-Among Events & Decor expects suppliers, contractors, consultants and other third parties acting on its behalf to comply with this Policy.

The Company may require relevant third parties to confirm their commitment to ethical business practices.

The Company may terminate or reconsider a business relationship where there is credible evidence of bribery, corruption, kickbacks or other serious unethical conduct.

## 13. REPORTING SUSPECTED BRIBERY OR CORRUPTION

Employees, clients, suppliers and other stakeholders are encouraged to report suspected bribery, corruption, secret commissions, kickbacks or other unethical conduct.

Reports may be made to:

Management: **B-Among Events & Decor**

Email: [services@bamongevents.com](mailto:services@bamongevents.com)

Telephone: **+256 782 684 258**

Reports will be treated appropriately and, as far as reasonably practicable, confidentially.

No person should suffer retaliation for raising a genuine concern in good faith.

## 14. INVESTIGATION AND DISCIPLINARY ACTION

B-Among Events & Decor may investigate allegations of bribery, corruption or other violations of this Policy.

Where misconduct is established, appropriate action may be taken, which may include:

- Disciplinary action;
- Termination of employment or engagement;
- Termination of a supplier or contractor relationship;
- Recovery of improperly obtained funds or benefits; and/or
- Referral to relevant authorities where appropriate.

## 15. RESPONSIBILITIES

**Management** is responsible for promoting a culture of integrity and ensuring that this Policy is communicated and implemented.

**Employees and representatives** are responsible for understanding and complying with this Policy and promptly reporting concerns.



**Suppliers and third parties** are expected to conduct themselves ethically and comply with applicable laws and contractual requirements.

## **16. COMMITMENT TO INTEGRITY**

B-Among Events & Decor believes that successful events should be delivered not only with creativity and excellence, but also with **honesty, transparency and professionalism**.

We will not compromise our values for business opportunities.

**We do not buy business, we earn it through quality, integrity and excellent service.**

## **17. POLICY REVIEW**

This Policy shall be reviewed periodically and may be updated to reflect changes in the Company's operations, applicable laws, regulatory requirements and best practices.