

Natural Joint Stock Company

Supplier and Intermediary Anti-Corruption Policy

1. Purpose and Scope

Natural Joint Stock Company (“NJSC”) is committed to conducting business with integrity and in compliance with all applicable anti-corruption laws, including the U.S. Foreign Corrupt Practices Act (FCPA) and the UK Bribery Act.

This policy applies to all **suppliers** and **intermediaries** (e.g., agents, consultants, distributors) who do business with or on behalf of NJSC.

2. Zero Tolerance for Bribery

NJSC prohibits offering or accepting bribes, kickbacks, or anything of value to or from:

- Public officials (including government employees, officials of state-owned enterprises, and political candidates).
- Private individuals or companies, if intended to improperly influence a business decision.

3. Prohibited Payments

You may not offer or authorize payment or anything of value to:

- Gain or retain business
- Obtain licenses or permits
- Influence inspections or reduce taxes
- Gain confidential information

4. Commercial Bribery

Bribery between private parties (e.g., NJSC’s employees, vendors, or customers) is strictly forbidden.

5. Facilitating Payments

“Facilitating payments” (small unofficial payments to speed up routine actions) are **prohibited**.

6. Accurate Books and Records

All invoices and records must be **complete, truthful, and backed by documentation**. NJSC will not reimburse undocumented or suspicious expenses.

7. Gifts, Travel, and Entertainment

Only modest gifts or business meals are permitted, and must:

- Be lawful
- Not be cash
- Be properly documented and related to legitimate business

Any gifts or travel for public officials require prior written approval.

8. Charitable and Political Contributions

No donations on NJSC's behalf may be made to:

- Influence a public official
- Gain an improper business advantage

Political contributions using NJSC's resources are strictly prohibited.

9. Reporting Violations

Suspected violations must be reported immediately to NJSC management. Retaliation against whistleblowers is strictly prohibited.