

Travel Blue Ltd. Anti-Corruption & Bribery Policy

Policy Statement:

At Travel Blue Ltd., we are committed to conducting our business with the highest ethical standards, integrity, and transparency. We recognize the harmful impact of corruption and bribery on society, business, and our reputation. This policy outlines our dedication to preventing corruption and bribery in all aspects of our operations.

Key Objectives:

- **Ethical Conduct:** We aim to uphold the highest ethical standards and promote a culture of integrity and accountability among our employees, partners, and stakeholders.
- **Compliance:** We will adhere to all applicable anti-corruption laws, regulations, and international standards, including the Foreign Corrupt Practices Act (FCPA) and the UK Bribery Act.
- **Zero Tolerance:** We maintain a zero-tolerance approach to corruption, bribery, and unethical practices.

Responsibilities:

- **Management:** The management team is responsible for setting anti-corruption and bribery prevention goals, allocating resources, and ensuring compliance with this policy.
- **Employees:** All employees are expected to adhere to ethical standards, report any concerns regarding corruption or bribery, and actively participate in anti-corruption efforts.

Prevention Measures:

- **Gifts and Entertainment:** We will establish clear guidelines on the giving and receiving of gifts, entertainment, and hospitality to ensure they do not create conflicts of interest or facilitate bribery.
- **Third-Party Due Diligence:** We will conduct due diligence on all third parties, including agents, intermediaries, and business partners, to assess their commitment to anti-corruption and compliance.
- **Financial Transactions:** We will continue to maintain accurate financial records and financial controls to prevent illicit payments and concealment of bribery.
- **Training and Awareness:** We will provide anti-corruption and bribery prevention training to employees to increase awareness and understanding of relevant laws and policies.

Reporting and Whistleblower Protection:

- We will establish mechanisms for employees to report suspected corruption or bribery anonymously and without fear of retaliation.

Investigation and Enforcement:



- We will investigate any allegations of corruption or bribery promptly and impartially and take appropriate corrective actions, which may include legal action.

Supplier and Partner Engagement:

- We will communicate our anti-corruption and bribery policies and expectations to suppliers, contractors, and business partners and seek their commitment to ethical business practices.

Review and Revision:

- This policy will be periodically reviewed and revised as necessary to reflect changes in technology, regulations, and our organization's commitment to anti-corruption and bribery prevention.

By implementing this Anti-Corruption & Bribery Policy, we demonstrate our dedication to ethical business practices, transparency, and accountability.

Effective Date: 01/10/2025