



LOGI's Anti-Corruption Policy

One of LOGI's main values is to promote transparency and accountability. Thus, LOGI takes action against all forms of corruption. This Anti-Corruption policy covers LOGI's work to prevent and detect any form of corruption.

LOGI expects its employees to understand and adhere to its Anti-Corruption Policy as well as ensuring that this policy is implemented.

In order to be able to detect and react adequately to all possible cases of corruption, it is important to establish clear definition of corruption:

A simplified definition of corruption would be:

"Corruption is a form of dishonesty or criminal offense undertaken by a person or organization entrusted with a position of authority, to acquire illicit benefit or abuse power for one's private gain"

Corruption can occur in many forms:

- **Paying or Offering a Bribe:** where a person improperly offers, gives or promises any form of material benefit or other advantage, whether in cash or in kind, to another in order to influence their conduct in any way.
- **Receiving or Requesting a Bribe:** where a person improperly requests, agrees to receive or accepts any form of material benefit or other advantage, whether in cash or in kind, which influences or is designed to influence the individual conducts any way.
- **Receiving or paying a "Facilitation" Payment:** where a person improperly receives something of value from another party for performing a service or other action that they were required by their employment to do anyway.
- **Patronage:** Where a person improperly benefits from their employment to favor their connections (Friends, relatives and others...)
- **Embezzlement:** Theft of resources or other assets that belong to an organization or individual for personal benefit.
- **"Kickback" Payment:** Where a person receives a shares of funds as a commission for participating in a corruption bid or a tender process
- **Abuse of a Position of Trust:** where a person improperly uses their position within their organisation to materially benefit themselves or any other party.



LOGI works on implementing several action points to prevent any sort of corruption, bribery or Fraud:

- **Awareness:** We make sure that all LOGI's employees are aware of this issue.
- **Reporting:** We make sure that all LOGI's employees are aware of the steps to be taken when facing such issues.
- **Prevention:** We make sure that by raising awareness and insuring good practices, LOGI's employees will help us minimize the risks of bribery, fraud and corruption
- **Responding:** Ensuring that there are actions taken whenever a case of fraud, bribery or corruption is detected to protect LOGI's assets and resources.

There are 5 Steps to follow when detecting a corruption case:

1. **Detecting:** When someone in LOGI suspects corrupt practices or receives a report of a suspected irregularity, the suspicion must be shared with the management along with the determination of the people involved and the supporting documents
2. **Reporting:** The one who suspects should then report the crime by email to the management along with all the supported documents
3. **Investigating:** The management should form a team to review and investigate the matter in order to have more information about it.
4. **React Properly:** When detecting a matter a certain reaction will take place at once. Depending on whom the suspect is, the initial reactions will differ (could be immediate reactions or reactions based on documentations)
5. **Close the case:** Closing the case will be done by preparing an investigative report to archive the case and the procedure. This includes all the documents, decisions taken throughout the process from detecting the incident to closing the case.

In order to have a better management of this issue, LOGI's employees are also responsible for:

- Protecting LOGI's assets from any form of fraud or corruption
- Informing their supervisor of any form of fraud or corruption you might face.
- Encouraging their colleagues to report on bribery as well
- Keeping all information as confidential

NB: Any un-reported case of bribery, fraud or corruption will not be tolerated by LOGI and could result in a termination of the employees agreement with LOGI.