
ANA GLOBAL LLC

Anti-Bribery and Anti-Corruption Policy

Revision: January 14th 2025

All suppliers and potential suppliers of “ANA Global LLC” (and its subsidiaries including but not limited to “ANA de Mexico, SA de CV” and “ANAGLB Trading S. de R.L. de C.V.”) [hereafter “**ANA**”] are not allowed to provide gifts to ANA’s employees.

ANA’s employees could be put in a situation that could lead the employees to be in breach of the ANA’s internal No Gift Policy.

Following page has the Policy outlining the rules on gifts for ANA’s employees concerning the receipt of gifts from suppliers or potential suppliers.

ANA’s employees will be required to comply with stricter restrictions on the receipt of gifts from suppliers and potential suppliers.

Thank you for your diligence in upholding these essential standards and maintaining the professionalism of the ANA’s employee’s community.



Sincerely,

Md Anwarul Hoque
CEO
ANA Global LLC

Anti-Bribery and Anti-Corruption Policy

Gifts Rules

1.- For ANA Purchasing Functions

The ANA's Internal Policy provides the specific mandatory directions for ANA's employees regarding the receipt of gifts from suppliers and potential suppliers.

2.- What is a Gift?

A gift is an object offered from a supplier or potential supplier for no payment, an offer of accommodation or any benefit which has a monetary value and is enjoyed by the beneficiary for free.

3.- What risks do the Gifts Rules minimize?

These Rules were created to minimize the risk of:

- Creating a conflict of interest where the recipient of a gift may not act solely in the interests of his or her employer;
- A supplier or potential supplier seeking to inappropriately obligate or influence the beneficiary of a gift; and
- Damaging the image of the companies.

4.- To whom does the Gifts Policy apply at ANA?

The Gifts Policy apply to all ANA employees and any member of their immediate families.

5.- To whom does the Gifts Policy apply to supplier?

This policy applies to all individuals working at all levels and grades, including senior managers, officers, directors, employees (whether permanent, fixed-term or temporary), consultants, contractors, trainees, seconded staff, home workers, casual workers and agency staff, volunteers, interns, agents, sponsors, or any other person associated with ANA, its subsidiaries or their employees (collectively referred to as workers in this policy), whether located in the US, Mexico or overseas. It also applies to third parties. In this policy, third party means any individual or organization you come into contact with during the course of your work, and includes actual and potential clients, customers, suppliers, distributors, business contacts, agents, advisers, and government and public bodies, including their advisors, representatives and officials, politicians and political parties.

6.- What is the Gifts Policy?

ANA has adopted the following "no gifts" mandate:

Gifts are not to be accepted from suppliers or potential suppliers. ANA's employees are prohibited from soliciting gifts, contributions, gratuities, services or favors from suppliers or potential suppliers.

7.- How does the Gifts Policy apply to standard business practices between suppliers and ANA's employees?

Business meals are not prohibited by the policy, as long as the expense incurred is reasonable and not lavish. Also, supplier's company souvenirs as calendars, diaries, pens, etc., are not prohibited by the policy, as long as the cost is reasonable.

8.- FCPA and Anti-Bribery Laws.

As used in this Section, the term "Anti-Bribery Laws" means the U.S. Foreign Corrupt Practices Act ("FCPA") or any similar law or regulation. Supplier must not act in any fashion or take any action that will render ANA or any of its affiliates liable for a violation of the Anti-Bribery Laws, which prohibit the offering, giving or promising to offer or give, directly or indirectly, money or anything of value to any official of a government, political party or instrumentality to assist Supplier or ANA in obtaining or retaining business or in carrying out Supplier's duties and activities under the Order. Additionally, Supplier agrees not to receive or accept any payments or other benefits from any parties associated with the performance of its duties and payments or other benefits from any parties associated with the performance of its duties and activities under the Order. Supplier agrees that failure to comply with the Anti-Bribery Laws, or receipt of payment or other benefits could compromise the integrity of the work performed and, therefore, ANA would have the right to terminate the Order immediately. Supplier agrees that if any developments cause a representation or certification previously provided to ANA, whether in a due diligence questionnaire or other document, regarding Anti-Bribery Laws to no longer be accurate or complete, it will promptly inform ANA, in writing, of the causes and extent of the changes.

9.- SUPPLIER RESPONSIBILITIES

You must ensure that you read, understand and comply with this policy. The prevention, detection and reporting of bribery and other forms of corruption are the responsibility of all those working for ANA, as well as to you, as an existing or potential Supplier.