



**Oasis Management Consultancy
Anti-Bribery Policy
Ver. 1**

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**Issued by: Oasis Management Consultancy
Approved by: Managing Director**

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1. Introduction

This Policy describes how Oasis Management Consultancy, 44 5 b Street, Building R163, Office 17, Dubai, UAE, (from here on referred to as: "Oasis Management Consultancy", "company", "we", us") commits to preventing bribery and corruption in its business practices.

Oasis Management Consultancy has zero-tolerance for bribery and corrupt activities. We are committed to acting professionally, fairly, and with integrity in all business dealings and relationships, wherever we operate. The company is committed to conducting business in an ethical and honest manner, and works continuously to enforce systems that ensure bribery and corruption is prevented.

Oasis Management Consultancy will constantly uphold all laws relating to anti-bribery and corruption in all the jurisdictions in which we operate. We are bound by the laws of the United Arab Emirates and adhere to the UK anti-bribery legislation, including the UK [Bribery Act 2010](#), in regards to our conduct.

2. Applicability

This anti-bribery policy applies to all employees (whether temporary, fixed-term, or permanent), consultants, contractors, trainees, seconded staff, home workers, casual workers, agency staff, volunteers, interns, agents, sponsors, or any other person or persons associated with us (including third parties), or any of our subsidiaries or their employees, no matter where they are located. The policy also applies to Officers, Trustees, Board, and/or Committee members at any level.

In the context of this policy, third-party refers to any individual or organisation our company meets and works with. It refers to actual and potential clients, customers, suppliers, distributors, business contacts, agents, advisers, and government and public bodies – this includes their advisors, representatives and officials, politicians, and public parties.

Any arrangements our company makes with a third party is subject to clear contractual terms, including specific provisions that require the third party to comply with minimum standards and procedures relating to anti-bribery and corruption.

3. Terms

Bribery

An illegal act of offering, giving, promising, asking, agreeing, receiving, accepting, or soliciting something of value or of an advantage so to induce or influence an action or decision.

Bribery is not limited to the act of offering a bribe and it applies also to an individual on the receiving end of a bribe and should they accept it.

Bribe	A bribe refers to any inducement, reward, or object/item of value offered to another individual in order to gain commercial, contractual, regulatory, or personal advantage.
Charitable Contribution	A financial donation (cash or a voucher of financial value) made by an individual or an organization to a nonprofit organization or a registered charity.
Corruption	A dishonest or fraudulent conduct by those in power, typically involving bribery.
Employee	In the context of this policy, an employee refers to any such personnel, employed or contracted by the company (whether temporary, fixed-term, or permanent), consultants, contractors, trainees, seconded staff, home workers, casual workers, agency staff, volunteers, interns, agents, sponsors, or any other person or persons associated with us (including third parties).
Facilitation Payment	A payment made to secure or expedite the performance of a routine or necessary action to which the payer has legal or other entitlement.
Political Contribution	A contribution made to a politician or a political campaign or a political party.
Third Party	In the context of this policy, third-party refers to any individual or organisation our company meets and works with, such as actual and potential clients, customers, suppliers, distributors, business contacts, agents, advisers, and government and public bodies, including their advisors, representatives and officials, politicians, and public parties.

4. What is and what is not acceptable

This section of the policy refers to the following four areas:

- Gifts and hospitality
- Facilitation payments
- Political contributions
- Charitable contributions

5. Gifts and Hospitality

Oasis Management Consultancy may accept normal and appropriate gestures of hospitality and goodwill (whether given to/received from third parties) so long as the giving or receiving of gifts meets the following requirements:

- It is in compliance with local law.
- It is given/received openly, not secretly.
- It is not made with the intention of influencing the party to whom it is being given.
- It does not include cash or a cash equivalent (e.g. a voucher or gift certificate).
- It is appropriate for the circumstances (e.g. giving small gifts around the seasonal holidays or as a small thank you to a company for helping with a large project upon completion).

Gifts, other than trivial ones with a low value, should be returned. In a culture where such an action might cause offence, the gift should be declared to the company and, if practical, donated to an appropriate charity.

6. Facilitation Payments

Oasis Management Consultancy does not accept and will not make any form of facilitation payments of any nature. We recognise that facilitation payments are a form of bribery that involves expediting or facilitating the performance of a public official for a routine governmental action and will categorically refuse from participating in any such transactions or behaviour. Any such instances, requests, proposals or demands made to the company, which may involve any forms of facilitation payments will be reported to be relevant authorities, in accordance with our zero-tolerance approach.

7. Political Contributions

Oasis Management Consultancy does not make donations, whether in cash, or by any other means, to support any political parties or candidates. We recognise this may be perceived as an attempt to gain an improper business advantage.

8. Charitable Acts and Contributions

Oasis Management Consultancy is committed in supporting local communities, whether through voluntary services, knowledge, time, or direct charitable financial contributions (cash or otherwise). We encourage charitable acts and contributions, providing that all such acts and transactions are legal, ethical, and adhere to relevant local laws and relevant regulations. The company agrees to disclose all charitable contributions it makes.

9. Policy Communication

Oasis Management Consultancy anti-bribery and corruption policy and our zero-tolerance attitude will be clearly communicated to all suppliers, contractors, business partners, and any third-parties.

Oasis Management Consultancy ensures to distribute awareness of relevant anti-bribery and corruption practices to its employees, personnel and third parties (as defined in the context of this policy), whenever required, particularly where there is a potential risk of facing bribery or corruption during business activities.

10. Record Keeping

Oasis Management Consultancy ensures to keep detailed and accurate financial records, and will have appropriate internal controls in place to act as evidence for all payments made. We declare and keep a written record of the amount and reason for hospitality or gifts accepted and given, and understand that gifts and acts of hospitality may be subject to an external review.

11. Monitoring and Reviewing

Oasis Management Consultancy Managing Director is responsible for monitoring the effectiveness of this policy and will review the implementation of it on a regular basis. This policy will be assessed for its suitability, adequacy, and effectiveness.

Internal control systems and procedures designed to prevent bribery and corruption are subject to regular audits to ensure that they are effective in practice.

Any need for improvements will be applied without any undue delays. The parties we engage with, including employees, associates, customers and business partners are encouraged to offer their feedback on this policy if they have any suggestions for how it may be improved. Feedback of this nature should be addressed to the company via the publicly available communication channels available on the company website at: <https://omcdxb.com/contact-us>, should a person wishing to provide such feedback lack direct contact details to any of the company representatives.

This policy does not form part of an employee's contract of employment and Oasis Management Consultancy may amend it at any time so as to improve its effectiveness at preventing bribery and corruption.