



Anti-Bribery and Corruption Policy

Document Ref: LUM-L9-250701-POL-002

Effective Date: 1 July 2025

Prepared by: Luminex Solutions

1. Purpose

This policy sets out Luminex Solutions' commitment to preventing bribery and corruption in all our operations across Jordan, Syria, and Lebanon. While operating in complex and often high-risk environments, we uphold the highest ethical standards and maintain full compliance with local and international anti-corruption principles.

2. Scope

This policy applies to all Luminex Solutions employees, contractors, advisors, and any third parties acting on behalf of the company. It is tailored to reflect operational realities in the Levant region and aligns with applicable laws in Jordan, international standards such as the UK Bribery Act 2010, and the UN Convention Against Corruption.

3. Definition of Bribery and Corruption

Bribery involves offering, giving, receiving, or soliciting something of value to influence a decision or action. Corruption refers to the abuse of entrusted power for private gain.

Examples include:

- Offering cash or gifts to expedite permits or secure contracts
- Accepting favours in exchange for influence
- Paying unofficial 'facilitation fees' to speed up government processes

4. Zero Tolerance Policy

Luminex Solutions adopts a zero-tolerance approach to bribery and corruption. This applies regardless of local customs or pressures. All personnel must:

Never offer or accept bribes or improper advantages



Avoid any appearance of impropriety or conflict of interest

Report suspected or actual breaches immediately

5. Regional Considerations and Practical Application

We acknowledge that working in Jordan, Syria, and Lebanon involves navigating bureaucratic inefficiencies, informal networks, and occasionally opaque government processes. To ensure a realistic and enforceable approach:

- All payments must be formally receipted and documented
- Where facilitation is unavoidable, it must be transparently recorded and reported to senior management
- Personnel must seek guidance before engaging local agents, fixers, or intermediaries
- Pre-engagement due diligence is mandatory for third-party representatives

6. Gifts, Hospitality, and Donations

Gifts and hospitality are permissible only when they are:

- Reasonable, proportionate, and infrequent
- Not intended to influence decision-making
- Fully disclosed to line managers and recorded

Charitable or sponsorship donations must:

- Be vetted by management
- Never be used as a means to gain undue business advantage

7. Record-Keeping and Transparency

We maintain clear records of all financial transactions, third-party engagements, and gifts or hospitality provided or received. Records must be retained and available for audit.

8. Reporting and Whistleblowing

Employees are encouraged to report concerns via:

- Direct supervisor or country manager
- Luminex compliance officer
- Secure, confidential reporting channel



Reports will be handled confidentially, without retaliation.

9. Training and Awareness

All staff must complete basic anti-bribery awareness during induction. Refresher training will be provided annually and after major operational changes.

10. Consequences of Breach

Violations of this policy may result in:

- Disciplinary action up to dismissal
- Termination of contract for third parties
- Legal reporting where required by law

11. Policy Review

This policy will be reviewed annually or following major regulatory or operational changes.

Version Control

Effective Date: 01/07/2025

Next Review: 15/07/2026

Version: 1.0