
Qinspect Ltd.
Anti Bribery Policy
(Revision Dated - May 17, 2019)

Every Q-Inspect employee and its associated companies, contractors and suppliers needs to apply effort and intelligence in maintaining the ethics value by:

- **Understanding the policy and implementing it**
- **Exercising due diligence and determination to prevent bribery**
- **Reporting bribery and attempted bribery case to management timely**
- **Guiding and helping new comers to understand and implement the policy**
- **Co-operating with audit and inspection team**
- **Providing any improvement suggestion to enhance the robustness of the policy**

Bribery is prohibited in any form direct and indirectly. Bribery or its acts is not tolerated by Q-Inspect

- **Q-Inspect and its associated companies, contractors and suppliers, including all their employees and associates, shall implement every possible measure to counter bribery**
- **Management shall take the leading position to establish, disseminate, explain and enhance the policy for countering bribery as well as monitoring the policy implementation**
- **All briberies or attempted briberies shall be reported, recorded and handled timely to conclude its validity, the deposition on those employees or associates involved and the preventive measures**
- **Regular audits by party with impartiality shall be carried out to ensure policy is fully implemented and/or trigger corrective actions if there is any violation found**
- **Employees or associates shall be encouraged and appreciated to raise issues related to bribery including self-reporting for violation of the policy**
- **Confidentiality shall be appropriately observed with right balance on transparency for fostering the value and the approach on countering bribery**
- **Due diligence shall be applied for any grey area or area not presented in this policy**

Gifts, sponsorship and souvenirs

- **Gifts, sponsorships & souvenirs including corporate souvenirs are prohibited to be offered to our customers or business partners**
- **Gifts and souvenirs including corporate souvenirs offered by contractors, suppliers and other business partners are forbidden to be received by every Q-Inspect employee and associate**

Hospitality and expenses

- **Hospitality and expenses offered by contractors, suppliers and other business partners are forbidden to be received by every Q-Inspect employee and associate**

-
- **Code of conduct of the receiving organization shall be observed before offering of any appropriate and social hospitality and expenses. Infraction of the receiving party's policy is strictly prohibited**
 - **Dollar value less than US\$ 10 per person for occasional event can be considered as acceptable internationally**

Internal Controls, Audit and Reporting

- **Q-Inspect shall plan and conduct its own audit at least once a year to validate the implementation of this policy**
- **Violations/Non-conformance found in the audit shall be documented and reported to CEO Q-Inspect immediately (max within 1 day). Hot line for bribery issues +420 724 334 655**
- **Actions to correct or/and prevent the re-occurrence of those violations shall be identified, implemented and completed within 30 days from the date of audit**

Monitoring and Review

- **Q-Inspect shall monitor the implementation of the anti-bribery program and periodically review of the program's suitability, adequacy and effectiveness and implement improvements as appropriate**