

HIKING IT

Policies

Introduction

Hiking IT is committed to conducting its business with the highest ethical standards and in compliance with all applicable laws and regulations. This policy establishes guidelines and procedures to prevent corruption, bribery, and unethical business practices. It applies to all employees, contractors, agents, and representatives of Hiking IT (referred to collectively as "Personnel").

Prohibition of Bribery and Corruption

2.1 Bribery: Personnel shall not offer, promise, give, request, or accept bribes or improper payments, whether in cash, gifts, services, or any other form, to or from any individual or entity, including government officials, customers, suppliers, or business partners.

2.2 Facilitation Payments: Personnel shall not make or authorize facilitation payments, which are small payments made to expedite routine government actions. Such payments are strictly prohibited.

2.3 Anti-Corruption Laws: Personnel must comply with all applicable anti-corruption laws, including the Foreign Corrupt Practices Act (FCPA), the UK Bribery Act, and other relevant local laws.

Conflicts of Interest

3.1 Disclosure: Personnel shall disclose any actual or potential conflicts of interest that may compromise their objectivity or impartiality in performing their duties for Hiking IT.

3.2 Recusal: Personnel with a conflict of interest shall recuse themselves from decision-making processes involving the conflicted matter and shall not use their position for personal gain.

Gifts, Entertainment, and Hospitality

4.1 Guidelines: Personnel may offer or accept gifts, entertainment, or hospitality that is reasonable, proportionate, and consistent with customary business practices. However, such offerings must not create an obligation or influence business decisions improperly.

4.2 Approval: Gifts, entertainment, or hospitality exceeding a predetermined threshold must be approved by the appropriate level of management, following Hiking IT's established procedures.

Reporting Violations

5.1 Reporting Mechanism: Personnel are encouraged to promptly report any suspected or actual violations of this policy to their immediate supervisor, the Compliance Officer, or through an anonymous reporting mechanism, such as a confidential hotline or email.

5.2 Non-Retaliation: Hiking IT prohibits retaliation against anyone who makes a good faith report or cooperates in an investigation regarding a suspected violation of this policy.

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Compliance Training and Communication

6.1 Training: Hiking IT shall provide periodic anti-corruption and business ethics training to ensure Personnel are aware of their obligations and the risks associated with non-compliance.

6.2 Communication: This policy shall be communicated to all Personnel through various channels, including employee handbooks, intranet, and training sessions.

Consequences of Non-Compliance

7.1 Disciplinary Actions: Violations of this policy may result in disciplinary action, up to and including termination of employment or contract, and may be reported to relevant authorities.

7.2 Legal Consequences: Non-compliance with anti-corruption laws and regulations may lead to criminal and civil penalties, fines, reputational damage, and legal liabilities.

Policy Review and Updates

Hiking IT shall regularly review and update this policy to ensure its continued relevance and effectiveness in addressing anti-corruption compliance and business ethics.