



**BBG ENERGY**

# **ANTI-BRIBERY & CORRUPTION POLICY**

# **BBG ANTI-BRIBERY AND CORRUPTION**

## **POLICY**

### **1. PURPOSE AND COMMITMENT:**

Baku Business Group MMC (“the Company”) is firmly committed to maintaining the highest standards of ethics, integrity, and transparency in all of its business operations.

The purpose of this Policy is to prevent bribery and corruption in any form, to ensure compliance with applicable laws, and to protect the Company’s reputation, clients, partners, and employees.

BBG maintains a zero-tolerance stance toward bribery, extortion, or any other corrupt practice.

### **WHY IT MATTERS:**

- Strong ethical conduct safeguards BBG’s credibility with clients, investors and authorities. It builds long-term trust and creates a sustainable business environment where transparency is valued as a strategic asset.

### **2. SCOPE:**

This Policy applies to all directors, executives, employees, contractors, consultants, suppliers and agents acting for or on behalf of the Company in Azerbaijan, Georgia, Türkiye and other jurisdictions of operation.

Why It Matters:

Defining scope ensures that everyone connected to BBG understands their ethical responsibilities, avoiding gaps that could allow unethical behavior to go unchecked in different countries or projects.

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### **3. KEY PRINCIPLES:**

- 1.Integrity: Act honestly and fairly in all dealings.
- 2.Transparency: Document and disclose all payments and transactions.
- 3.Accountability: Every employee is responsible for ethical conduct.
- 4.Proportionality: Controls should match the Company's risk exposure and operations.

### **WHY IT MATTERS:**

- Adhering to core principles creates a consistent corporate culture of trust, helps avoid legal risks and fosters confidence among partners and clients.

### **4. DEFINITIONS:**

- Bribery: Offering or accepting anything of value to influence a decision.
- Facilitation Payment: Unofficial payment to expedite routine actions.
- Kickback: Returning a portion of funds to reward improper favor.
- Conflict of Interest: Personal interests that compromise professional judgment.

### **WHY IT MATTERS:**

- Clear definitions help employees recognize misconduct early and act before issues escalate into legal violations or reputational damage.

### **5. LEGAL FRAMEWORK:**

Aligned with the UK Bribery Act 2010, US FCPA, OECD Anti-Bribery Convention, UN Convention Against Corruption and the laws of Azerbaijan, Türkiye and Georgia.

### **WHY IT MATTERS:**

- Compliance with global and local laws protects BBG from criminal liability, financial penalties and international blacklisting, while ensuring smooth cross-border operations.

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### **6. PROHIBITED CONDUCT:**

Employees and representatives must not:

- Offer or accept bribes, kickbacks or improper benefits;
- Make facilitation payments;
- Manipulate financial records;
- Ignore or conceal suspected violations.

### **WHY IT MATTERS:**

- Eliminating prohibited acts prevents loss of contracts, penalties and loss of trust from partners and regulators, protecting both the Company and individual employees.

### **7. GIFTS, HOSPITALITY AND DONATIONS:**

Reasonable, transparent gestures are allowed only if they cannot influence business decisions and are properly recorded. All major gifts or entertainment must be approved in advance. Political or charitable donations require written authorization from the Board.

### **WHY IT MATTERS:**

- Clear rules on gifts and donations protect employees from conflicts of interest and ensure that corporate resources are used for legitimate business purposes only.

### **8. RESPONSIBILITIES:**

- Board of Directors: Provides oversight and ethical leadership.
- Management: Implements preventive controls and training.
- Employees: Follow this Policy and report any suspicious activity.
- Third Parties: Obligated to comply with BBG's ethical standards.

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### **9. REPORTING AND WHISTLEBLOWING:**

All employees and partners may report suspected violations confidentially at [internal@bbgholding.org](mailto:internal@bbgholding.org). Anonymous submissions are accepted. Retaliation is strictly prohibited.

#### **WHY IT MATTERS:**

- Encouraging safe reporting channels helps detect problems early, protect honest employees, and build a transparent and trust-based culture.

### **10. TRAINING AND AWARENESS:**

BBG regularly provides training on anti-corruption principles, risk identification and reporting procedures. Employees are expected to refresh their knowledge periodically.

#### **WHY IT MATTERS:**

- Continuous training keeps staff vigilant, empowers ethical decision-making and reduces the chance of accidental policy breaches.

### **11. RECORD KEEPING:**

All financial and business records must be accurate, complete and verifiable. Hidden accounts or undocumented payments are forbidden.

#### **WHY IT MATTERS:**

- Transparent record-keeping prevents fraud, supports audit trails and ensures regulatory compliance during external reviews.

### **12. CONSEQUENCES OF VIOLATION:**

Any breach of this Policy may result in disciplinary action up to dismissal, termination of contracts or legal prosecution.

#### **WHY IT MATTERS:**

- Clear sanctions reinforce personal accountability and demonstrate that ethical breaches carry serious consequences for individuals and the organization.

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### **13. MONITORING AND CONTINUOUS IMPROVEMENT:**

The Company will periodically review and update this Policy to reflect changes in law or business practice. Audits and management reviews ensure ongoing effectiveness.

### **WHY IT MATTERS:**

- Regular evaluation keeps the Policy relevant and proactive, ensuring BBG remains aligned with international standards and stakeholder expectations.

### **14. APPROVAL AND VALIDITY:**

This Policy is approved by the Board of Directors of Baku Business Group MMC and is effective from January 2025 until amended or replaced.

**Approved by:** Mehrali Gasimov, Chairman of the Board

**Version:** 1.0