

Business Ethics & Anti-Corruption Policy

Bribery, facilitation payments, gifts and hospitality, conflicts of interest, fraud and money laundering

Document No.	TL-POL-ACP-010	Revision	01
Effective date	01-10-2026	Next review	30-09-2027
Policy owner	Ethics Officer	Approved by	Chairman
Scope	All employees, managers, owners and anyone acting on behalf of Trade Linx (agents, sub-contractors), in all business with public and private customers	Classification	Public – available to all stakeholders

1. Commitment

Trade Linx (established 2005, Firm Reg. No. 2829-2005, NTN 2289271-7) supplies CIJ/TIJ industrial coding and marking printers, inks, solvents, consumables and spare parts, packaging machinery and IT equipment, and provides installation, maintenance, repair and annual maintenance contract (AMC) services. It operates from one site at 16-J Johar Town, Lahore, with 17 employees (2025).

Trade Linx has **zero tolerance** for bribery, corruption, fraud and money laundering. A large part of our business is with public-sector bodies through tenders, where the risk is higher, so we hold ourselves to strict standards. We comply with the **Pakistan Penal Code** (sections 161–165A), the **Prevention of Corruption Act 1947**, the **National Accountability Ordinance 1999**, the **Anti-Money Laundering Act 2010** and the **Public Procurement Regulatory Authority (PPRA/PPRA Punjab) Rules**.

2. Scope and responsibilities

Role	Responsibilities
Chairman	Approves this policy, sets the tone from the top, decides on serious cases.
Ethics Officer Akhtar Ali, HR & Admin Manager	Owns this policy; gives advice; keeps the gifts & hospitality and conflict-of-interest registers; runs training and the annual corruption risk assessment; receives whistleblowing reports; reports to the Chairman every quarter.
Finance	Approves payments only with proper documents; performs customer and supplier due diligence; no cash payments above PKR 50,000.
All employees	Read, sign and follow this policy; complete annual training; report concerns.

3. Bribery and corruption

- Never offer, promise, give, ask for or accept anything of value to improperly influence a decision, directly or through a third party.
- No facilitation ("speed") payments to officials, for example to release goods at customs or to speed up a tender payment.
- Agents and consultants are appointed only after due diligence and a written contract with an anti-bribery clause.
- No political contributions on behalf of Trade Linx. Charitable donations need Chairman approval and are recorded.

Red flags – stop and ask the Ethics Officer

- A tender official hints that an "arrangement" will help us win, or asks for a commission, gift or job for a relative.
- A customer purchasing officer asks for a personal discount, cash or a free printer.
- An agent asks for an unusually high commission or payment to a third-party account.
- Someone asks us to split an invoice or change specifications so a purchase stays under an approval limit.

4. Gifts, hospitality and sensitive transactions

Gifts and hospitality must be modest, infrequent, transparent and never given during a tender. The approval procedure is:

Value (per person, per occasion)	Private-sector counterpart	Public official
Up to PKR 5,000 (e.g. branded items, working lunch)	Allowed; record in register	Written approval of Ethics Officer
PKR 5,001 – 25,000	Written approval of Ethics Officer	Not allowed
Above PKR 25,000, cash or cash equivalents, travel	Not allowed without Chairman approval (cash never)	Not allowed

Sponsorships, donations, customer travel for factory training and any payment to an agent are sensitive transactions and need prior written approval of the Chairman and Ethics Officer.

5. Conflicts of interest

Employees must avoid situations where personal interests could conflict with Trade Linx interests, e.g. a financial interest in a supplier or competitor, hiring relatives, or a second job with a customer. All conflicts must be declared in writing on joining, every year and whenever they arise, and are recorded in the conflict-of-interest register. Purchases from related group companies (Tech Linx, Inkjet Limited, GSOL USA) are made at arm's length and documented.

6. Fraud

Falsifying records, invoices, expense claims, tender documents, certificates or test reports, or misusing company assets, is fraud. Payments require segregation of duties (request – approval – payment), and bank reconciliations are reviewed monthly.

7. Money laundering

We know our customers and suppliers: we verify NTN/registration, ownership and bank details before the first transaction. Payments must go to accounts in the name of the contracting party. Unusual payments (third-party payers, large cash, over-payments and refunds) are reported to the Ethics Officer.

8. Quantitative targets

KPI	Baseline (2025)	Target	Target year
Employees who signed the policy acknowledgment	0% (introduced 2026)	100% (every year)	2026
Employees trained on anti-corruption and ethics	0% (introduced 2026)	100% every year	2026
Staff in sales/tenders and procurement trained on red flags	0% (introduced 2026)	100%	2026

KPI	Baseline (2025)	Target	Target year
Corruption risk assessment updated	None – introduced 2026	Every year	2026
Suppliers and agents with signed anti-bribery clause	0% (introduced 2026)	100% of active suppliers	2027
Confirmed corruption incidents	0	0 every year	Annual

9. Reporting concerns and disciplinary measures

Concerns can be raised with a manager, the Ethics Officer, or confidentially (anonymously if preferred) through the Whistleblowing & Grievance Procedure **TL-SOP-GRV-010**: email **akhtar@tradelinx.pk**, phone/WhatsApp **+92 321 4777002**, or a sealed letter to the Chairman. Trade Linx guarantees confidentiality and **no retaliation** against anyone who reports in good faith.

Violations lead to disciplinary action under the Service Rules, from a written warning to dismissal, recovery of losses, termination of supplier or agent contracts, and reporting to the authorities where required by law.

10. Questions and answers

- **Q: A customer asks me to include a "service charge" in our quotation that will be paid to his personal account. What do I do?** A: Refuse, do not proceed, and report it to the Ethics Officer. This is a bribe.
- **Q: Can I give a box of sweets to a customer at Eid?** A: Yes, if it is below PKR 5,000, not during a tender, and you record it in the gifts register.
- **Q: My brother owns a shop that could supply us with spare parts.** A: Declare the conflict in writing; you must not be involved in selecting or approving that supplier.

11. Communication and review

This policy is given to every employee at induction and each year, published on www.tradelinx.pk, and shared with suppliers and agents. Every employee signs the acknowledgment in Annex A. It is reviewed at least once a year and after any incident or change in law.

Approval

This document was approved by the Chairman of Trade Linx on 01-10-2026 and is effective from that date. It is communicated to all employees and relevant stakeholders, applies until superseded and is reviewed at least annually.

Prepared by: Ethics Officer

Approved by	Signature and company stamp	Date
Chairman, Trade Linx	Approved and signed by the Chairman – signed original held at Trade Linx Head Office, Lahore	01-10-2026

Revision history

Rev.	Date	Description of change	Approved by
00	2024	First issue of Anti-Corruption Policy.	Chairman
01	01-10-2026	Full revision to add quantitative targets with baselines, governance, scope and review mechanism.	Chairman

Annex A – Employee acknowledgment

I confirm that I have received, read and understood the Trade Linx Business Ethics & Anti-Corruption Policy (TL-POL-ACP-010) and the Information Security & Data Protection Policy (TL-POL-ISM-010), that I will comply with them, and that I will report any breach I become aware of. I understand that a breach may lead to disciplinary action.

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