

## ANTI-CORRUPTION POLICY – Bauerberg Klein

### 1. INTRODUCTION

BK Training & Consulting Limited, a provider of technical training and consulting services to the oil and gas industry, is committed to conducting business with the highest standards of **integrity and ethical conduct**. This **Anti-Corruption Policy** establishes clear guidelines to prevent, detect, and address corruption in all BK operations.

### 2. SCOPE

This policy applies to:

- All **BK employees**, including management and temporary staff.
- **Contractors, consultants, agents, and representatives** acting on BK's behalf.
- All BK operations, **regardless of location**.

### 3. DEFINITIONS

- **Corruption**: Abuse of power for personal or third-party gain.
- **Bribery**: Offering, promising, giving, requesting, or accepting undue advantages to influence decisions.
- **Lack of Integrity**: Any act violating BK's ethical principles.

### 4. STANDARDS

BK strictly prohibits:

- Bribes to **public or private officials**.
- Improper gifts, payments, or favors to clients, suppliers, or partners.
- Misuse of **confidential information** for personal benefit.
- Any act that could be perceived as corrupt.

### 5. PROCEDURES

To enforce compliance, BK implements:

- **Mandatory Training**: All employees and contractors must complete anti-corruption training.

- **Oversight:** Regular internal audits by management.
- **Reporting Mechanism:** Suspected violations must be reported to [info@bauerberg-klein.com](mailto:info@bauerberg-klein.com).

#### 6. GIFTS, HOSPITALITY & ENTERTAINMENT POLICY

Gifts or hospitality are permitted **only if**:

- **Nominal in value** (e.g., corporate meals, branded merchandise).
- **Transparent and properly recorded** in BK's tracking system.
- **Never influence business decisions.**

#### 7. RESPONSIBILITIES

- **Jonás Matías Bauerberg (Director):** Oversees policy adherence and approves updates.
- **Management Team:** Ensures implementation and conducts periodic reviews.

#### 8. DISSEMINATION

This policy is available via:

- Company intranet.
- Employee handbook.
- [www.bauerberg-klein.com](http://www.bauerberg-klein.com).

#### 9. UPDATES

BK will review this policy **annually** or as needed to reflect legal changes.



**Jonas Bauerberg**

Director

BK Training & Consulting Limited

Alders Farm Fishery, Ivy Lane, Great Brickhill

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