

## Zbuilderz

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<b>POLICY NAME</b>	Ethical Trading Policy			<b>POLICY NO.</b>	3.0
<b>EFFECTIVE DATE</b>	October,2018	<b>DATE OF LAST REVISION</b>	December,2019	<b>VERSION NO.</b>	1.0
<b>ADMINISTRATOR RESPONSIBLE</b>	Hussam Al-Tayeb	<b>Initials</b>	H.T		
<b>APPLIES TO:</b>					
Human Resources	✓	Marketing & Sales	✓	Procurement	✓
Accounting	✓	Operations	✓	Quality Control	✓

VERSION HISTORY				
VERSION	APPROVED BY	REVISION DATE	DESCRIPTION OF CHANGE	AUTHOR
1.0	Rabih Maarouf	December,2019	No changes	HT

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## ANTI-TERRORISM POLICY STATEMENT

**Zbuilderz** renounces all forms of terrorism and will never knowingly support, tolerate or encourage terrorism or the activities of those who embrace and or finance terrorism. **Zbuilderz** is firmly committed to the international fight against terrorism, and in particular, against the financing of terrorism. It is the policy of **Zbuilderz** to seek to ensure that none of its contributions is used, directly or indirectly, to provide support to individuals or entities associated with terrorism.

## SCOPE OF WORK

This policy applies to all **Zbuilderz** departments and it may affect some stakeholders.

In case of suspected terrorism related activity, stakeholders and employees are encouraged to report

## PROCEDURE

This procedure has a strong emphasis on “deter, detect, prevent, and respond”.

To minimize the risk of terrorism, and in particular terrorism financing, **Zbuilderz** employs the following approach:

1. Conduct regular risk analysis concerning anti-terrorism activities. The risk analysis typically includes a review of the relevant legal requirements of stakeholder to determine the risk of terrorism targeting or undermining our operations.
2. Maintain comprehensive financial records, which account for all expenditure and publishes annual financial statements with detailed breakdown of incomes and expenditures.
3. Conduct annual external audit of all expenses as well as external audits of specific projects.
4. Ensure training of its staff and partners on anti-diversion policies, procedures and practices.
5. Apply a “know your supplier” principle for procurements for all national, international and restricted tenders.