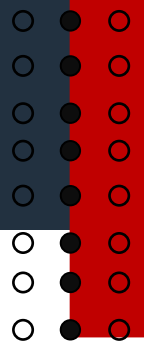




J3ST SOLUTIONS



Anti-Corruption and Business Ethics Policy 2019/25



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INTRODUCTION



Why this Policy matters

At **J3st Solutions Ltd**, integrity is non-negotiable.

This Policy sets our global standards for lawful, ethical conduct and confirms our **zero-tolerance** for bribery, corruption, and improper influence in any form.

It applies to every employee, director, contractor, agent, and representative, wherever we do business.

Aligned with applicable laws (including the **UK Bribery Act** and, where relevant, the **U.S. FCPA**, the Policy explains what's **prohibited** (bribes, kickbacks, facilitation payments, off-the-books records), what's **restricted** (gifts, hospitality, and entertainment—especially involving Government Officials), and the **controls** required for commissions and third parties (due diligence, written contracts, and reasonable, transparent fees).

It also sets expectations for avoiding conflicts of interest, keeping accurate books and records, completing required training, and cooperating with reviews and audits.

We encourage everyone to **speak up early** if something seems wrong. Reports made in good faith are protected from retaliation. This Policy is reviewed periodically as laws and best practices evolve, always check the latest version or ask for guidance at compliance@j3st.eu.



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1.

Purpose and Scope

This policy applies to all employees, contractors, directors, agents, and representatives of **J3st Solutions Ltd**, globally.

This policy establishes **J3st Solutions** commitment to conducting business with integrity, fairness, and transparency.

It sets clear standards to prevent bribery, corruption, unethical practices, and improper influence in our dealings with customers, suppliers, business partners, and Government Officials.

2.

Guiding Principles

This policy applies to all employees, contractors, directors, agents, and representatives of **J3st Solutions Ltd**, globally.

Zero Tolerance: **J3st Solutions** has a zero-tolerance approach to bribery, corruption, and unethical practices.

Compliance with Law: All applicable anti-corruption, anti-bribery, and trade laws (including the UK Bribery Act and the U.S. FCPA, where applicable) must be strictly followed.

Integrity First: Business decisions must never be influenced by improper personal gain.

3.

Prohibited Practices

This policy applies to all employees, contractors, directors, agents, and representatives of J3st Solutions Ltd, globally.

- Employees and representatives** must not, directly or indirectly:
Offer, promise, give, or authorize any bribe, kickback, or improper payment to obtain or retain business.
- Request** or accept bribes, gifts, or anything of value that could improperly influence their duties.

Use third parties (agents, consultants, distributors, etc.) to circumvent this policy.

4.

Gifts, Hospitality, & Entertainment

This policy applies to all employees, contractors, directors, agents, and representatives of J3st Solutions Ltd, globally.

	<p>Permitted: Low-value, customary, and reasonable business courtesies (e.g., modest meals, small promotional items) that are legal, infrequent, and transparent.</p> <p>Prohibited: Cash, cash equivalents, lavish entertainment, or anything that creates a sense of obligation.</p>
	<p>Government Officials: Any gift, meal, or hospitality offered to a Government Official must receive prior written approval from Compliance/Management, regardless of value.</p> <p>Transparency: All gifts and entertainment must be accurately recorded in company expense reports.</p>

5.

Commissions, Agents, & Third Parties

This policy applies to all employees, contractors, directors, agents, and representatives of J3st Solutions Ltd, globally.

	<p>Due Diligence: Before engaging agents, consultants, or distributors, proper vetting and written contracts are required.</p> <p>Reasonableness: Commissions and fees must be commensurate with legitimate services provided.</p>
	<p>No Facilitation Payments: "Grease" or facilitation payments to speed up routine government actions are strictly prohibited.</p>

6.

Conflicts of Interest

This policy applies to all employees, contractors, directors, agents, and representatives of **J3st Solutions Ltd**, globally.

Employees must disclose any personal or financial interest that could influence, or appear to influence, their professional judgment.

7.

Record-Keeping and Transparency

This policy applies to all employees, contractors, directors, agents, and representatives of **J3st Solutions Ltd**, globally.

All financial transactions must be fully and accurately recorded in **J3st Solutions'** books and records.

False, misleading, or off-the-books entries are prohibited.

8.

Purpose and Scope

This policy applies to all employees, contractors, directors, agents, and representatives of J3st Solutions Ltd, globally.

	<p>Duty to Report: Employees must promptly report any suspected violation of this policy via internal reporting channels or directly to management.</p> <p>No Retaliation: Retaliation against whistleblowers is strictly prohibited.</p>
	<p>Disciplinary Action: Violations may result in disciplinary action, including termination, and may also lead to legal consequences.</p>

9.

Training and Awareness

This policy applies to all employees, contractors, directors, agents, and representatives of **J3st Solutions Ltd**, globally.

All employees and relevant third parties will receive periodic training on anti-corruption compliance and business ethics.

10.

Review and Oversight

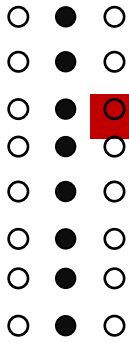
This policy applies to all employees, contractors, directors, agents, and representatives of **J3st Solutions Ltd**, globally.

This policy will be reviewed annually by senior management and updated as necessary to reflect evolving legal and regulatory requirements.

Approved **by**: _____

Position: _____

Date: _____



Need guidance or an approval? Contact compliance@j3st.eu.



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