



The Power of Energy, on land and sea

Antilles Power Depot
PH: (787) 622-9330 Fax: (787) 622-9333
1000 Carr. 860 Carolina, P.R. 00987-7187
www.antillespower.com

Policy Code	PP-HR-002-01		
Document Name	Anti-Bribery and Corruption Policy for Third Party		
Department	Human Resources		
Created by	Alejandra Alvarez Ruiz, HR & Compliance Manager	Date	3/07/2023
Amend by	Sara Indira Luciano, JD, MA / HR Manager	Date	8/28/2023
Effective Date	September 8, 2023	Last Revision Date	August 2023
Approval Date		General Manager Signature	

Message from the General Manager

At Antilles Power Depot, Inc. we are committed to conducting business with the highest business standards of ethics and integrity when dealing with Third Parties. This Policy for employees and Third-Parties has been developed as a guideline to ensure that everyone at Antilles, including Third-Parties, adhere to the standards set out herein and that their actions are consistent with legal and regulatory requirements worldwide.

Our success depends on supplier and customer relationships that are built on trust and mutual benefit. We will always manage our relationship with Third-Parties with honesty, respect and integrity, offering equal opportunities for all parties involved.

Sincerely,

José Escobar

Purpose

Antilles Power Depot (APD) is committed to the prevention, deterrence, and detection of fraud, bribery, and all other corrupt business practices. It is the policy of APD to conduct all its business activities with honesty, integrity, and the highest possible ethical standards and vigorously enforce its business practice, wherever it operates throughout the world, of not engaging in bribery or corruption.

You commit the offence of bribing a foreign public official as soon as the offer is made.

What is not acceptable under this Policy?

It is not acceptable for you (or someone on your behalf) to:

- accept an offer of a gift of any size from any Third-Party which is in negotiation with, or is submitting a
- proposal with us;
- give, promise to give, or offer, any payment, gift, hospitality or advantage with the expectation or hope
- that a business advantage will be given or received or to reward a business advantage already given;
- give, promise to give, or offer, any payment, gift or hospitality to a government official, agent or
- representative to “facilitate” or expedite a routine procedure,
- accept or solicit any payment, advantage, gift or hospitality from a Third Party that you know or suspect
- is being offered with the expectation that it will obtain a business advantage for them;
- threaten, or retaliate against, another employee who has refused to commit a bribery offence or who
- has raised concerns under this Policy; or
- engage in any activity that might lead to a breach of this Policy.

Bribery and corruption are not only against our company values; they are illegal and can expose both the employee and the company to fines and penalties, including imprisonment and reputational damage. This policy set a minimum standard that must be followed. Where local laws, regulations or rules impose a higher standard, that higher standard must be followed.

How we Operate with Integrity

We expect from Antilles personnel and Third-Parties to understand and adhere to the following principles related to this policies:

Anti-Bribery and Anti-Corruption: Antilles operates under a **zero-tolerance** policy towards bribery and corruption. All Third Parties and Antilles personnel are expected to comply with anti-bribery and anti-corruption laws in effect in countries where Antilles Power Depot conducts business.

Anti-Money Laundering: Antilles employees and Third Parties must comply with all applicable laws and regulations that prohibit money laundering. Antilles employees and Third Parties should make sure not to facilitate or support the process of covering up the source of illicit funds of terrorist or criminal activities through legitimate business.

Antitrust: Antilles employees and Third Parties must ensure business is conducted in an open and competitive manner in compliance with all applicable laws and regulations regarding fair competition and antitrust. We provide Third-Parties with equal opportunities to bid on and win contracts by conducting our procurement policies and processes consistently, respectfully, and confidentially.

Health and Safety: All business activities performed by Antilles employees or Third-Parties must be carried out in a safe and efficient manner by following all regulations, laws, policies and procedures ensuring we take care

Review and Revision History

We are committed to continuously reviewing and updating our policies and procedures based on the learning. This is so even when APD enters new market/sector/country which may pose a risk under this Policy. Any improvements identified will be made as soon as possible. Therefore, this document is subject to modification from time to time. The Policy will be reviewed and audited from time to time which requires cooperation from all concerned.

Required – Include last revision date, the current revision number, who made the changes to the policy and procedure and the reason for the change, if any.

Date	Revision No.	Revision by:	Reason for Change
3/07/2023	01	Alejandra Alvarez HR & Compliance Manager	New creation
08/28/2023	02	Sara Indira Luciano HR & Compliance Manager	Amends