

Alhamadah Almutahida

Commercial Registration No. 412256



Anti-Bribery and Anti-Corruption Policy

Document: AHM-ABC-01

Revision: 1.0

Process Owner: Chief Executive Officer

Intended Users: Alhamadah Almutahida. All employees and business associates.

Last updated: August 2026

CONTENTS

1.	PURPOSE
2.	SCOPE
3.	COMMITMENTS
4.	IMPLEMENTATION
5.	RESPONSIBILITIES AND REPORTING
6.	EFFECTIVE DATE

1. PURPOSE

- 1.1. In the scrap trade the opportunity for corruption sits in the weight and in the grade, both of which decide what is paid. This policy states that we will not allow it there or anywhere else in our dealings.
- 1.2. We comply with the anti-corruption laws of the State of Kuwait and of every country we ship material to.

2. SCOPE

- 2.1. This policy applies to every director and employee of Alhamadah Almutahida, and to our business associates, including agents, suppliers, subcontractors, hauliers and any other party performing services for or on behalf of the company.
- 2.2. It applies at our yard, at our office, and at any client site our people or our vehicles enter. Where a client operates a stricter standard, the client's standard applies.

3. COMMITMENTS

- 3.1. We do not offer, give, request or accept a bribe, a kickback or a facilitation payment, in any form, to win business or to keep it.
- 3.2. We give effect to these commitments through the following, which include but are not limited to:
 - a) **Weights and Grades**

A weight or a grade is never adjusted in exchange for a personal benefit to anyone, on either side of a transaction. This is treated as gross misconduct.
 - b) **Public Officials**

No payment or personal benefit is offered to an employee of a client, a supplier or a public body in order to influence a decision or to speed a process.
 - c) **Gifts and Hospitality**

Gifts and hospitality are modest, openly given, never in cash, and never offered or accepted while a decision is being made.
 - d) **Books and Records**

Our books and records reflect what actually happened. Every load carries a weight ticket and every payment carries a record. No transaction is left off the books.
 - e) **Business Associates**

We do not engage an agent or intermediary to do what this policy forbids us from doing ourselves, and we require the same standard of our suppliers and subcontractors.
 - f) **Refusal and Protection**

Any employee may refuse such a request and report it. Nobody is penalised for refusing, and no employee will suffer for business lost as a result.

4. IMPLEMENTATION

- 4.1. Employees whose work involves quoting, weighing, grading or settlement are briefed on this policy when they join and are reminded of it when their duties change.

- 4.2.** A breach is grounds for disciplinary action up to and including dismissal, and for ending a relationship with a supplier or subcontractor.

5. RESPONSIBILITIES AND REPORTING

- 5.1.** Responsibility for observing this policy rests with every person it covers. Oversight rests with the Chief Executive Officer, and day to day implementation with management.
- 5.2.** Anyone, whether employed by the company or not, may report a breach. A person who reports in good faith is given confidentiality and is protected from any adverse consequence for having reported.
- 5.3.** Reports may be made to the Chief Executive Officer directly, using the telephone number printed at the foot of this document.

6. EFFECTIVE DATE

- 6.1.** This policy was approved by the Chief Executive Officer and is effective from the date shown below. It is reviewed at least once a year, and whenever the work, the law or a client requirement changes.

Effective from **31 August 2026**

Mohammed Sajid

Chief Executive Officer
Alhamadah Almutahida

Al Hashan Complex, Floor 5, Office 28, Street 66, Block 7, Fahaheel, Kuwait · +965 6616 3881 · [alhamadah-website.pages.dev](#)