

ANTI-BRIBERY AND CORRUPTION POLICY

LEXIM TRADING DMCC

Updated on 23 October 2024

1. PURPOSE AND OBJECTIVES

- 1.1 Lexim Trading DMCC ("**Lexim**") is committed to complying with applicable laws and regulations consistent with its obligations in all jurisdictions in which it operates. Lexim is committed to conducting business in accordance with the highest ethical standards and prohibits all forms of bribery and corruption. Lexim strives to conduct business with integrity and in accordance with applicable laws where Lexim operates and takes a zero-tolerance approach to bribery and corruption.
- 1.2 The purpose of this policy (the "**Policy**" or the "**ABC Policy**") is to reinforce Lexim's commitment to the prevention and deterrence of bribery and corruption, outline expectations regarding employees' behaviour and define Lexim's Policy and procedure regarding giving and receiving anything of value which can be perceived as a bribe.

2. SCOPE AND APPLICABILITY

- 2.1 The Policy is applicable globally across Lexim and in accordance with relevant laws and regulations and internal rules, policies, and procedures. All employees and associated persons of Lexim, regardless of department or job description, including the Board, consultants, and contractors, are required to comply with this Policy. The higher standard shall prevail if there is any conflict between the local requirements and this Policy.
- 2.2 The Compliance Officer ("**CO**") will regularly monitor the ABC Policy's effectiveness. Any deficiencies identified should be dealt with as soon as possible. It is reviewed and, as needed, updated on an annual basis or whenever there is a material change to Lexim's business practices, operations, or regulatory requirements that require Policy changes. The revised Policy is distributed to all employees and relevant associated persons of Lexim, published on the intranet, and related training conducted, as required.

3. MANAGEMENT APPROVAL

- 3.1 The Board shall have the overall responsibility for ensuring that the ABC Policy is up-to-date and complies with all applicable laws and regulations in all jurisdictions where Lexim conducts its business. Following this, the senior management team has the responsibility for ensuring that this Policy complies with Lexim's legal and ethical obligations and that all employees comply with it. Managers at all levels are responsible for ensuring that those reporting to them are made aware of and understand this Policy, undertake training on implementing and adhering to it, and monitor compliance with it.
- 3.2 The CO and the compliance team are responsible for coaching, advising, and guiding line managers on implementing and using the Policy.

4. GENERAL PROHIBITION

- 4.1 All forms of bribery, including (i) offer, (ii) promise, (iii) agree to pay, (iv) authorise payment of, (v) pay, (vi) give, (vii) accept, or (viii) solicit anything of value are prohibited. Promising to give a bribe / Kickback or agreeing to receive it before it has taken place is also a violation of this Policy. Lexim's employees should also avoid circumstances that even create the appearance of Bribery. Any breach of this Policy or anti-bribery regulations could result in disciplinary action, including termination of employment. Bribery, Kickback, and Facilitation Payments are prohibited when dealing with any person (individual and entities) both in the public or private sector.

- 4.2 Neither Lexim nor its employees may directly or indirectly offer, promise, authorise or pay anything of value to any person, whether a private individual, a representative of a government or corporate entity or any other person or entity, where the purpose is to improperly induce the recipient to take or to refrain from taking an action that would result in a Commercial Advantage to Lexim, its subsidiaries (if any) or any other party. These restrictions apply both directly as well as indirectly (e.g., offering, promising, authorising and paying anything of value to family members, close associates or favoured organisations of Government Officials or any other persons or entities (including those in the private sector) as well as charities or not-for-profit institutions that may be associated in any way or form to family members, close associates or favoured organisations of Government Officials or any other persons or entities when done with the purpose to unlawfully induce to make or abstain from a certain decision).
- 4.3 No employee or authorised representative may directly or indirectly seek, receive, or accept anything of value where the purpose is to improperly induce the employee or authorised representative to take or refrain from taking an action that would result in a Commercial Advantage to the person or entity providing anything of value, its subsidiaries, or any other party.
- 4.4 In coordination with the compliance team and using a risk-based approach, Lexim is responsible for establishing satisfactory due diligence and monitoring procedures for its representatives, consultants, distributors, resellers, vendors, suppliers, contractors, and all other respective business partners. Such due diligence procedures shall include a reasonable investigation into the business partners' background, reputation, and business capabilities. Lexim's Outsourcing Policy details the procedure for the due diligence to be undertaken for all third-party service providers.
- 4.5 Employees must be careful when agreeing on fees and payment terms with third parties, agents, brokers, distributors, and other business partners, as some types of compensation arrangements can be used or viewed as Bribery. The deliverables that are to be provided for the agreed upon fees must be clearly defined and documented. For example, descriptions of deliverables and payments to agents or consultants must be clear and accurate.
- 4.6 Payments that are vague or outside of regular payment practices or standards can be a sign that some payments are being used improperly.
- 4.7 Commissions, discounts, bonuses, and other similar payments should be carried out in accordance with adequately established accounting and finance procedures and criteria. Employees must never make any side payments or other unauthorised use of Lexim's funds. All forms of compensation must be properly approved, documented, and processed to accurately reflect the nature of transactions and free from any inaccurate, false, or deceptive information or data. This is important because for a bribe to be paid, the funds must be taken from our company; if we can stop the flow of corrupt payments, we can prevent acts of Bribery in many situations. Any requests for additional bonuses, discounts or other payments must be properly authorised and documented in accordance with Lexim's finance manual.
- 4.8 All systems for tracking commissions, discounts, and other payments must be properly used in line with established and approved procedures.
- 4.9 To summarise the general principles of forbidden forms of bribery and corruption, it is prohibited for any members of the Board and all staff to:
- (a) give, promise to give, or offer payment, gifts, or hospitality to a third party or otherwise permit a bribery offence to occur, with the expectation or hope that an advantage in business will be received or to reward a Commercial Advantage already given. Employees must refuse to accept or make the payment from or to a third party, explain Lexim's Policy against accepting or making such payments, and clarify that the refusal is final and non-negotiable. In case an employee encounters any difficulty making a refusal, they should seek assistance from the compliance team. Immediate reporting is essential.
 - (b) give, promise to give, or offer a payment, gift, or hospitality to a third party to facilitate or expedite a routine procedure;
 - (c) accept hospitality from a third party if it knows or suspects that such payment, gift, or hospitality is offered or provided with an expectation that a Commercial Advantage will be provided by Lexim in return;

- (d) engage in any activity that might lead to a breach of the anti-bribery and corruption rules and guidelines of any applicable international or local laws.

4.10 Avoiding and Managing Conflicts of Interest

- (a) In some situations, engaging companies and individuals with a personal relationship with an employee on Lexim's behalf can appear or constitute a Conflict of Interest. Should a Conflict of Interest arise or an employee becomes aware of its existence, the employee must refrain from making any decisions while the Conflict of Interest exists and must bring the matter to the attention of their manager, the compliance team, or the human resources department.
- (b) Employees and third parties shall avoid situations that may create a Conflict of Interest between Lexim and themselves.
- (c) Employees and third parties shall never take advantage of their relationship with Lexim for personal gain or any other goal that may impact their judgement, loyalty, or objectivity.
- (d) Please refer to Lexim's Conflicts of Interest Policy for more detailed guidance on this matter.

4.11 Gifts, Travel and Entertainment

- (a) Bona fide hospitality and promotional, or other business expenditures such as gifts, travel or entertainment expenditures seeking to establish cordial relations, is recognised as an important part of doing business. This Policy does not prohibit reasonable and proportionate gifts, hospitality, entertainment and other business expenditures when intended for genuine purposes and of minimal value. The following are some important rules of what is acceptable (for more details, see Section 5 of this Policy):
 - i. It is bona-fide and made in the normal course of business and does not create the appearance (or an implied obligation) that the gift giver is entitled to preferential treatment, an award of business, better prices, etc.
 - ii. Gifts, meals, entertainment, and travel should not be lavish, extravagant or out of line with country or industry norms.
 - iii. Frequent gifts to the same individual/business, even if inexpensive, are inappropriate.
 - iv. Gifts, meals, entertainment, and travel should have a justifiable business purpose.
 - v. Gifts must be given openly, at an appropriate time and circumstance—not secretly or through a third party.
 - vi. Gifts, entertainment and hospitality should comply with prevalent laws and regulations.
 - vii. Lexim's employees should be present at all meals and entertainment activities and exercise good judgment in choosing entertainment that does not jeopardise the company's reputation or interests.
 - viii. Lexim should pay for meals, entertainment, and/or travel only for invitees whose participation is directly related to and necessary for Lexim's legitimate business purposes.
 - ix. Gifts should only be accepted when they align with the principles of this Policy and any applicable laws or regulations.
 - x. The acceptance of gifts should not influence or appear to influence the business decisions or actions of Lexim employees.
- (b) Examples of Acceptable Gifts
 - i. Promotional items with a company logo of nominal value, such as pens, keychains, or notepads.
 - ii. Meals or refreshments offered during business meetings, conferences, or training events.

- iii. Tokens of appreciation, such as small gift baskets or personalised items, with a value within the acceptable limit.
- iv. Gifts provided as part of a customary business practice in the local culture, within the limits defined by this policy and local laws.

If you have any doubts about whether a gift, meal, entertainment or travel expense is appropriate, the best course of action is to seek guidance from the compliance team.

(c) Interaction with Government Officials

- i. Lexim seeks transparent and cooperative relationships with governments.
- ii. Lexim, its employees and associated persons shall not offer or give anything of value with the intention to influence a government official to obtain or retain business or a Commercial Advantage.

(d) Facilitation Payments

- i. Lexim prohibits Facilitation Payments which seek to expedite or secure the performance of a particular routine governmental action by a government official.

(e) Agents

- i. Agents are individuals or entities paid by Lexim who negotiate with third parties on Lexim's behalf. Lexim is committed to promoting compliance with its ABC Policy by all third parties acting on Lexim's behalf.
- ii. Lexim can be held liable for actions by third parties. The acts of the agents will be considered the acts of Lexim. As such, all third parties should be made aware of the terms of this Policy and the obligation to comply with it. Employees must not partner with any third party who is suspected of or known for engaging in bribery.
- iii. Appropriate due diligence should be undertaken before any third parties are engaged. The level of due diligence will vary depending on the circumstances. For "red flags" involving third parties, refer to Appendix B of this Policy.

(f) Charitable Donations

- i. Lexim believes in contributing to the communities in which it does business. While charitable contributions are encouraged, Lexim only makes charitable donations that are legal and ethical under local laws and practices and within the organisation's corporate governance framework.
- ii. Lexim employees should ensure that the contribution is not an indirect way of conferring a personal benefit on a government official or related party and that the contribution is not in exchange for a purchasing or other decisions affecting Lexim's interests. Employees and third parties should not make payments, whether in cash or in kind, to political candidates, political officials or political parties for the purpose of obtaining, retaining or directing business to Lexim.

5. OFFERING AND RECEIVING GIFTS, ENTERTAINMENT AND HOSPITALITY

5.1 Gifts, entertainment, and hospitality cited in this Policy may be acceptable if they are reasonable, proportionate, made in good faith and in compliance with Lexim's policies and procedures. However, receiving or giving anything of value should have a clear business purpose and follow the approval procedure established in the following sections.

5.2 Lexim's employees must declare to the compliance team all gifts and hospitality accepted or offered above USD 5000 as well as those declined. The record must include:

- (a) date of acceptance, offer or decline of gift or hospitality, and date of event where relevant. Next to the date indicate with (A) for acceptance, (O) for offer and (D) for decline;
- (b) name, job title and organisation of recipient / provider;
- (c) nature and purpose of gift or hospitality received or declined;
- (d) estimated value, and
- (e) reason given for providing/receiving/declining gift/hospitality.

- 5.3 Lexim's employees can report gifts or hospitality given or received from third parties to the compliance team. Gifts must be reported before sending them or immediately after receiving them. Hospitality must be reported before the relevant event. If reasonable circumstances exist for which you cannot report this before an event, you must report it as soon as possible after the event. In circumstances where it would be offensive to decline the gift and dishonour the tradition of gift-giving, employees must disclose the gift. The compliance team will inform you if further information is required upon submission.
- 5.4 The compliance team records all reported gifts and hospitality in the internal gifts and hospitality register, which the Chief Executive Officer ("**CEO**") or the CEO's assigned delegate reviews regularly.
- 5.5 Please note that gifts you receive from Lexim's employees or hospitality that only involve Lexim's staff are not reportable under this Policy. To establish the value of any offered gifts or hospitality, you should conduct online price research. If you have any doubts about anything in this Policy, you shall discuss them with the compliance team.
- 5.6 For "red flags" involving third parties, refer to the list in Appendix B of this Policy. If you encounter any of the activities listed in Appendix B, you must promptly report it to the compliance team.

6. RESPONSIBILITY & PENALTIES FOR NON-COMPLIANCE

- 6.1 All employees, including the senior management team and applicable contracted service agents, must report to the compliance team as soon as possible if they believe or suspect that an action in conflict with the Policy has occurred or may occur or has been solicited by any other entity. The employees understand and acknowledge they may face the following for failure, knowingly or unknowingly, to comply with this Policy:
- (a) Disciplinary actions that include termination of employment;
 - (b) Criminal and civil action; and
 - (c) Financial penalty.
- 6.2 Penalties can range from fines to prison sentences. Additionally, the business can be held civilly or criminally liable for the acts of their employees, including the senior management team and contracted service agents.

7. INVESTIGATION PROCEDURE

- 7.1 The CO shall investigate any report of a violation or possible violation of the anti-bribery and corruption guidelines of the Policy and shall follow these procedures:
- (a) An investigation file should be opened. In the case of an oral report, the CO should prepare a written summary.
 - (b) The CO shall appoint an Independent Entity that shall promptly commission the conduct of an investigation.
 - (c) The compliance team will initiate the investigation and inform the Board. The investigation will document all relevant facts, including parties involved and times and dates.
 - (d) The entity employed to conduct the investigation will provide the CO with a written investigation report upon completion of the investigation. If any unlawful conduct is found, the CO must advise the Board accordingly.
 - (e) The entity employed to conduct the investigation shall prepare a written summary of the remedial actions taken.
 - (f) If any unlawful conduct is found, Lexim will take such remedial action as the Board deems appropriate to achieve compliance with the Policy and all applicable anti-bribery and corruption laws.
 - (g) The CO shall prepare an investigation report and a written summary of the remedial actions taken. The records shall be retained for a period of at least eight (8) years from the completion of the remedial action.
- 7.2 The Board is also required to report to the CO if they believe or suspect that an action in conflict with this Policy has occurred, or may occur, or has been solicited by any other entity.

7.3 If an employee is uncertain about whether a particular action or situation may violate this Policy, they must seek guidance from the Compliance Team, if feasible. Additionally, they are required to update the CO promptly after taking any action in such circumstances.

7.4 The identity of the individual disclosing relevant information to the CO should be treated in accordance with applicable UAE laws and regulations.

8. TRAINING AND DEVELOPMENT

8.1 The CO is responsible for implementing and providing anti-bribery and corruption training programmes for the Board members and staff. Training on the ABC Policy forms part of the induction and onboarding programme made available to all new employees. All new employees joining Lexim are required to certify that they have read and understood this Policy. On an ongoing basis, Lexim's employees will receive regular training with regard to their obligations under this Policy. Additional training will be provided periodically for employees and third parties who have direct or indirect contact with government officials.

9. WHISTLEBLOWING POLICY

9.1 Lexim is committed to conducting its business with the highest ethics, integrity, and compliance standards. As part of this commitment, we encourage all employees, contractors, and stakeholders to report any known or suspected violations of laws, regulations, internal policies, or unethical conduct within Lexim. This Whistleblowing Policy is designed to provide a framework for individuals to report such concerns and protect them from retaliation.

9.2 All employees have the responsibility to report behaviour that violates this Policy and applicable laws via appropriate channels.

9.3 Any Lexim employee or Board member who realises or suspects that any parties are participating in activities that are inappropriate or contrary to our standards and policies is encouraged to report all suspected criminal or unethical conduct. Lexim treats all reports confidentially, consistently, fairly and in a timely manner.

9.4 Reporting Channels

Staff and Board members can raise the concerns through the company's email address or mailing address as mentioned in this Policy, either in person or anonymously.

Concerned Individuals:

- (a) Line Manager
- (b) Head of Human Resources

Lexim's Email Address for Reporting: compliance@lexim.gold or hr@lexim.gold.

Lexim's Mailing Address for Reporting: Lexim Trading DMCC, Mazaya Business Avenue 2201, Tower AA1, First Al Khail St Jumeirah Lake Towers, Dubai, United Arab Emirates

9.5 Individuals may choose to report concerns anonymously. To facilitate this, Lexim has established a confidential reporting channel through which whistleblowers can report their concerns without revealing their identities. The anonymous reporting can be made via and anonymous e-mail to compliance@lexim.gold or hr@lexim.gold.

9.6 Without forced preference, Lexim also encourages staff and Board members to report concerns directly to their supervisor, manager, or the designated whistleblower officer. Non-anonymous reporting may allow for a more efficient investigation and follow-up process.

9.7 The Whistleblowing channel shall be used to report any of these concerns related to, but not limited to, the following areas:

- (a) Insider trading/profiting from material non-public information;
- (b) Money laundering or financing of illegal activities;
- (c) Conflicts of interest or abuse of authority;
- (d) Cybersecurity breaches or data privacy breaches;
- (e) Violations of applicable laws, regulations, or industry standards;

- (f) Corruption or bribery;
- (g) Fraud, theft, embezzlement, misappropriation of company funds or assets;
- (h) Harassment, discrimination or retaliation;
- (i) Unethical, improper, illegal behaviour or conduct;
- (j) Health and safety violations; and
- (k) Environmental violations.

9.8 Protection of Whistleblowers

- (a) Any report of suspicious conduct will be treated as confidential, and no employee will be threatened and/or retaliated for refusing to commit a bribery offence or raising a concern or report in good faith. All employees in such scenarios are protected from suffering any detriment, loss of employment or victimisation.
- (b) This Policy allows for reports to be made by entities outside of Lexim and ensures the protection of identity and confidentiality of the entity who has made a report at all times.
- (c) Any form of retaliation, including but not limited to adverse employment actions, threats, harassment, or discrimination, against a whistleblower will be treated as a serious violation of this Policy and may result in disciplinary action, including termination of employment and potentially further legal action.

9.9 Reporting and Investigation Process

- (a) Whistleblowers are encouraged to provide as much detail as possible when submitting their concerns, including specific incidents, individuals involved, dates, and supporting evidence. Anonymous whistleblowers are encouraged to provide sufficient information to enable proper investigation.
- (b) Upon receiving a report, the designated whistleblower officer or an appropriate representative of the compliance team will review and evaluate the concern. An internal investigation will be conducted to gather facts and evidence if necessary. The investigation will be handled promptly, impartially, and with due regard to all parties' rights.
- (c) Where possible, whistleblowers will be provided with an acknowledgement of receipt of their report. While maintaining confidentiality, whistleblowers may be contacted for additional information or clarification during the investigation process. After the investigation is completed, Lexim will take appropriate action based on the findings and communicate the outcome, where permitted, to the whistleblower.

9.10 Record Keeping

- (a) Lexim will maintain adequate records of all whistleblower reports, investigations, and actions taken, ensuring the confidentiality and security of such records in accordance with applicable laws and regulations.

9.11 Training and Awareness

- (a) Lexim will provide Whistleblowing Policy training and awareness programs to all employees, contractors, and stakeholders to ensure understanding of the Whistleblowing Policy and its importance in maintaining a culture of integrity and compliance. This training forms part of the induction and onboarding programme made available to all new Board members and staff. All new employees joining Lexim are required to certify that they have read and understood this Policy. On an ongoing basis, Lexim's employees will receive regular training regarding their obligations under this Policy.

9.12 Non-Exclusivity

- (a) This Whistleblowing Policy is in addition to and does not replace any other reporting channels or legal rights that may be available to individuals under applicable laws and regulations.

9.13 Policy Review

- (a) As an integral part of the ABC Policy, this Whistleblowing Policy will be periodically reviewed and updated by CO as necessary to ensure its effectiveness and compliance with changes in laws and regulations.

9.14 Contact Information

For any inquiries or reporting under this Whistleblowing Policy, please contact the CO.

10. **RECORDKEEPING**

- 10.1 It is part of Lexim's Policy to maintain relevant records for audit and compliance reasons. Therefore, Lexim will keep for at least five (5) years all financial records in place, including all expense claims relating to hospitality, gifts or expenses incurred in relation to third parties. All accounts, invoices, memoranda and other documents and records relating to dealings with third parties, such as clients, suppliers and business contacts, shall be prepared and maintained with strict accuracy and completeness. No accounts shall be kept "off-book" to facilitate or conceal improper payments.
- 10.2 Due to the nature of the business, most of the records are stored digitally or electronically. For this purpose, the Firm maintains a specially designated folder on a secure server with limited access for relevant employees, as well as an access audit trail.

[Appendix to follow]

APPENDIX - A

Term	Definition
Board	means "Board of Directors" or "Governing Board," which is a group of individuals elected or appointed to oversee the activities and governance of Lexim. The Board is responsible for making key decisions, setting strategic direction, ensuring Lexim's resources are managed effectively, and representing the interests of shareholders or stakeholders.
Bribery and Corruption	Bribery is the offering, giving, receiving, or soliciting of anything of value in order to gain any commercial, contractual, regulatory or personal advantage. Corruption is an abuse of a position of trust in order to gain an undue advantage.
Commercial Advantage	a benefit which is construed broadly to include, by way of example only, obtaining or retaining business, obtaining preferential treatment, or securing political, governmental, or business concessions.
Compliance Officer or CO	is a professional responsible for ensuring that Lexim adheres to all relevant laws, regulations, industry standards, and internal policies. Their primary role is to help Lexim manage risk by developing, implementing, and monitoring compliance programs and procedures.
Conflict(s) of Interest	may occur or appear to occur if personal interests (e.g., relationships, activities, or obligations) of an employee or an authorised Representative are inconsistent or interfere with or have the potential to be inconsistent or interfere with, in any way, with (i) the interests of Lexim or (ii) the duties and obligations owed to Lexim. A Conflict of Interest may occur even without any unethical or improper behaviour.
Facilitation Payments	also known as "grease" payment, is a financial payment that may constitute a bribe and is made to government officials to expedite or facilitate non-discretionary actions or services, such as obtaining an ordinary license or business permit, processing government papers such as visas, customs clearance and so on. This definition of Facilitation Payment does not include the payment of fees to expedite, fast track or speed up service in accordance with an official and published price list.
Government Officials	broadly construed to include: (a) any elected or appointed government official; (b) any employee or other person acting for or on behalf of a government official, agency, instrumentality, or enterprise that performs a government function; (c) any political party, officer, employee, or other person acting for or on behalf of a political party, or any candidate for public office; or (d) any employee or person acting for or on behalf of a public international organisation. The terms also include any employee or other person acting for or on behalf of any entity that is wholly or partially government-owned or controlled. "Intermediary": includes but is not limited to agents, distributors, consultants, sales representatives, implementation partners and sales partners
Independent Entity	means an individual or company capable of conducting the investigation impartially, without any bias, and possessing adequate knowledge of this Policy.
Kickbacks	is a form of negotiated bribe where payment is given to a recipient as compensation or reward for providing favourable treatment or services to another party. It is usually a sum of money that is paid to someone illegally.

Policy or ABC Policy	is a formal set of guidelines or principles that govern the actions, decisions, and procedures within Lexim pertaining to anti-bribery and corruptions laws and regulations.
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APPENDIX – B

This is a non-exhaustive list of potential warning signs for corruption, to which employees must pay attention and report to the compliance team.

- (a) A Lexim colleague or third party engages in or has been accused of engaging in improper business practices.
- (b) A colleague or third party has a reputation for paying bribes or requiring that bribes are paid to them or has a reputation for having a "special relationship" with government officials.
- (c) A third party insists on receiving a commission or fee payment before committing to a contract with Lexim or carrying out a government function or process for Lexim.
- (d) A third party requests payment in cash and /or refuses to sign a formal contract or to provide an invoice or receipt for a payment made.
- (e) A third party requests that payment be made to a country or geographic location other than where the third party resides or conducts business.
- (f) A third party requests an unexpected additional fee or commission to "facilitate" a service.
- (g) A third party demands lavish entertainment, hospitality, or gifts before commencing or continuing contractual negotiations or providing services.
- (h) A third party requests that a side payment be made to "overlook" potential legal violations.
- (i) A third party or employee requests that a Lexim employee provide employment or some other advantage to a friend or relative.
- (j) An invoice from a third party appears to be non-standard or customised.
- (k) A third party insists on using side letters (*i.e.*, agreed terms in a letter or other document outside the written contract between the parties) or refuses to include the agreed terms in a written agreement.
- (l) Invoice for a commission or fee payment that appears large given the services stated to have been provided.
- (m) A third party requests / requires the use of an agent, intermediary, consultant, distributor, or supplier that is not typically used by or known to Lexim.
- (n) Lexim staff is offered an unusually generous gift or offered lavish hospitality by a third party.