

Anti-Corruption Policy

Policy Statement

It is our policy to conduct all of our businesses in an honest and ethical manner. We take a zero-tolerance approach to bribery and corruption. We are committed to act professionally, fairly and with integrity in all our relationships and business dealings wherever we operate. We are also committed to implement and enforce effective systems to counter bribery.

Purpose of the Anti-Corruption Policy

This policy outlines acceptable and non-acceptable behaviors to ensure compliance with anti-corruption laws. This includes compliance with all laws, domestic and foreign, prohibiting improper payments, gifts or inducements of any kind to and received from any person, including officials in the private or public sector, customers and suppliers.

Definitions:

Bribe: Anything of value given in an attempt to affect a person's actions or decisions in order to gain or retain a business advantage. Anything of value includes cash, entertainment or other gifts or courtesies.

Corruption: The misuse of a public office or power for private gain or the misuse of private power in relation to business outside the realm of government.

Facilitation payments: Small sums paid to government officials to facilitate or expedite routing. Non-discretionary government actions are considered facilitation payment.

Kickbacks: The return of a sum already paid or due as a reward for awarding of furthering the business.

The areas of business where corruption, including bribery, can most often occur include:

1. Gifts, Entertainment and Hospitality
2. Facilitation Payments
3. Procurement Process
4. Political, Community and Charitable Contributions

What is not Acceptable?

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

1. give, promise to give, or offer, a payment, gift or hospitality with the expectation or hope that a business advantage will be received, or to reward a business advantage already given;
2. give, promise to give, or offer, a payment, gift or hospitality to a government official, agent or representative to "facilitate" or expedite a routine procedure;
3. accept payment from a third party that you know or suspect is offered with the expectation that it will obtain a business advantage for them;
4. accept a gift or hospitality from a third party if you know or suspect that it is offered or provided with an expectation that a business advantage will be provided by us in return;
5. threaten or retaliate against another worker who has refused to commit a bribery offense or

who has raised concerns under this policy; or

6. engage in any activity that might lead to a breach of this policy.

Employees' Responsibilities.

1. Employee must ensure that you read, understand and comply with this policy.
2. The prevention, detection, and reporting of bribery and other forms of corruption are the responsibility of all those working for us or under our control. All workers are required to avoid any activity that might lead to, or suggest, a breach of this policy.
3. Employee must notify the manager and/or the Compliance Manager as soon as possible if he/she believes or suspects that a conflict with this policy has occurred, or may occur in the future. For example, if a client or potential client offers something to gain a business advantage with us, or indicates that a gift or payment is required to secure their business. Further "red flags" that may indicate bribery or corruption are set out in the Schedule.
4. Any employee who breaches this policy will face disciplinary action, which could result in dismissal for gross misconduct.

What to do if you are a victim of Corruption or Bribery?

It is important that employee tell the Compliance Manager as soon as possible if he/she is offered a bribe by a third party, are asked to make one, suspect that this may happen in the future, or believe that he/she is a victim of another form of unlawful activity.

Protection

Workers who refuse to accept or offer a bribe, or those who raise concerns or report another's wrongdoing, are sometimes worried about possible repercussions. We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken.

Who is Responsible for the Policy?

1. The Senior Management Team have overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.
2. The Compliance Manager has primary and day-to-day responsibility for implementing this policy, and for monitoring its use and effectiveness and dealing with any queries on its interpretation. Management at all levels is responsible for ensuring those reporting to them are made aware of and understand this policy and are given adequate and regular training on it.

Training Contents-Anti Corruption

To achieve this goal, anti-corruption training usually pursues two major objectives:

- Raising awareness on the forms, causes, and consequences of corruption and how it flourishes in a given context, with the view to promote an in-depth understanding of the phenomenon;
- Providing tools and problem-solving skills to address identified corruption challenges in practice.

Anti-corruption training should not only focus on providing knowledge and information about

corruption, but also tackle the implementation challenges participants may be confronted to in a given sector or environment. There should, therefore, be the right mixture of theoretical and practical knowledge transfer, with adequate room given to finding constructive solutions to overcome potential obstacles to the successful implementation of anti-corruption efforts.

Types of Training:

1. Integrity Training
2. Anti-Bribery Training
3. Awareness Raising Training

Training methods should be:

1. Contextualised
2. Participatory
3. Role playing
4. Story telling
5. Case studies
6. Small “buzz-group” technique
7. Focus group discussions