

Anti-Bribery and Anti-Corruption Policy

Introduction

This document defines Control Risks' policy on the avoidance of bribery and corruption. We are committed to maintaining the highest ethical standards of our business practices throughout the company and will not engage in bribery or corruption.

Adherence to the clear guidelines set out in this policy will ensure that the company and its employees comply with anti-bribery and anti-corruption laws and governmental guidance.

1. Policy

1.1 Bribes and kickbacks

The company does not take part in acts of corruption, or pay bribes or receive kickbacks either *directly* or *indirectly*. The company prohibits its employees from engaging in acts of corruption, and from paying bribes or kickbacks to, or accepting bribes or kickbacks from, *public officials* and *private individuals* such as the personnel of companies with which the company does business.

1.2 Facilitation payments

The company and its employees will not make facilitation payments even if such payments are local practice or custom. The company accepts that refusal to make illicit payments may lead to commercial delays.

1.3 Gifts and expenses

The Company and its employees may not offer to, or accept from, third parties, gifts, rewards, benefits or other incentives that could affect either party's impartiality, influence a business decision or lead to the improper performance of an official duty. Similarly, they may not offer or accept cash donations.

1.4 Personal conflicts of interest

Company employees must avoid situations or transactions in which their personal interests could conflict or might be seen to be in conflict with the interests of the company. This includes

- i. acting on any client information gained through their employment with the company for personal gain,

- ii. passing such information to a third party; or
- iii. acting in any way that could be construed as insider trading. Employees must disclose any personal conflict of interest or perceived conflict to their line manager.
- iv.

1.5 Charitable donations

Donation to charitable organization must be transparent and properly documented.

1.6 Business relationships

The company expects its business partners to approach issues of bribery and corruption in a manner that is consistent with the principles set out in this policy.

1.7 Suppliers ,contractors , external Provider/service

The company will ensure that the procurement procedure for appointing suppliers, contractor, external provider/service is open, fair and transparent. The selection of contractors will be based an evaluation by an appointed committee.

2 Authority and Responsibility

If there is any doubt about the application of this policy, please refer to the CEO or Whistle Blowing Committee as appointed by CEO if necessary.

3 Non-Compliance

Failure to ensure compliance with this policy could lead to the following consequences for employees:

- Personal criminal liability followed by fines or imprisonment;
- Disciplinary action initiated by the company, including dismissal.

Acknowledgment of received , understand and comply:

Supplier Name :

Chop & Sign :

Document No : ETH-PC-001, Rev.1 , Rev. Date : 1/6/2020