

1. The Company prohibits bribery or corruption in any form whether direct or indirect.
2. The Company prohibits the offer, gift, or acceptance of a bribe in any form, including kickbacks to provide improper benefits to customers, agents, contractors, suppliers or employees of any such party or government officials
3. The Company also prohibits an employee from arranging or accepting a bribe or kickback from customers, agents, contractors, suppliers, or employees of any such party or from government officials, for the employee's benefit or that of the employee's family, friends, associates or acquaintances.
4. The Company, its employees or agents should not make direct or indirect contributions to political parties, organisations or individuals engaged in politics, as a way of obtaining advantage in business transactions.
5. The Company will ensure that charitable contributions and sponsorships are not being used as a subterfuge for bribery
6. The Company will if asked disclose all its charitable contributions or sponsorships.
7. The Company will prohibit the offer or receipt of gifts, entertainment or expenses whenever such arrangements could affect the outcome of business transactions and are not reasonable and bona fide expenditures
8. The MD is responsible for ensuring that the policy is carried out consistently with clear lines of authority
9. The Company will apply its policy to the best of its ability in its dealings with subsidiaries, joint venture partners, agents, contractors and other third parties with whom it has business relationships.
10. The Company should conduct due diligence before entering into a joint venture.
11. The Company will not channel improper payments through an agent.
12. Compensation paid to agents should be appropriate and justifiable remuneration for legitimate services rendered.
13. The company will conduct its procurement practices in a fair and transparent manner.
14. The company will to the best of its abilities avoid dealing with prospective contractors and suppliers known to be paying bribes.
15. Recruitment, promotion, training, performance evaluation and recognition will reflect the enterprise's commitment to the policy.
16. The company makes it clear that no employee will suffer demotion, penalty, or other adverse consequences for refusing to pay bribes even if it may result in the enterprise losing business
17. Senior management of the company will monitor the policy and periodically review the policy's suitability, adequacy and effectiveness and implement improvements as appropriate