

---

# **Policy on Anti-Bribery and Corruption**

---

## Document Control

### Document properties

<b>Owner</b>	Compliance Officer
<b>Version</b>	Version 1.0
<b>Review frequency</b>	Once in every two years or as and when required to accommodate any changes in regulatory or other requirements.

### Authorization

<b>Drafted by</b>	Risk & Compliance Department
<b>Approved by</b>	Board of Directors
<b>Date</b>	

**Table of Contents**

- 1. Introduction ..... 4
- 2. Policy statement ..... 4
- 4. Application of the policy ..... 4
- 5. Limitations of the policy ..... 4
- 6. Anti-bribery and corruption standards ..... 5
- 7. Red flags ..... 6
- 8. Responsibilities under the policy ..... 6
- 9. Associated entities ..... 7
- 10. Record-keeping ..... 7
- 11. Responsibility for the policy ..... 7
- 12. Monitoring and review ..... 8
- 13. Policy reviewing frequency ..... 8
- 14. Consequences of non-compliance with the policy ..... 8
- 15. Policy reviewing frequency ..... 8

## **1. Introduction**

AFPLC conduct all of our work in an honest and ethical manner. AFPLC take a zero-tolerance approach to bribery and corruption and are committed to acting professionally, fairly and with integrity in all our business dealings and relationships and in the promotion of the global goals.

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for gross misconduct.

This policy does not form part of any employee's contract of employment and we may amend it at any time.

## **2. Policy statement**

This policy shall act as a guide in conducting all of its business in an honest and ethical manner. Individuals involved in corrupt activity shall be subjected to disciplinary or legal action. AFPLC is committed to upholding all laws relevant to countering corruption in each of the jurisdictions in which it operates.

### **3. The purpose of this policy is to:**

- i. To emphasize on the responsibilities to all individuals who work for AFPLC, in observing and upholding the company's position on bribery and corruption;
- ii. Provide information and guidance to those individuals working for AFPLC on how to recognize and deal with bribery and corruption issues.

## **4. Application of the policy**

This Policy extends across all of the Company's business dealings and in all the territories in which the AFPLC operates. All persons covered by this policy, in discharging their duties on behalf of AFPLC, are required to comply with the laws, rules and regulations applicable in the location in which AFPLC is performing business activities, and in particular with respect to anti- corruption laws, rules and regulations. Where uncertainty or ambiguity exists.

## **5. Limitations of the policy**

This policy will not cover all the legal aspects pertinent to the anti-corruption.

## 6. Anti-bribery and corruption standards

It is prohibited for directors, officers, and employees, PEPs or family members of those to:

(a) give, promise to give, or offer, a payment, gift, donation or hospitality to a third party or otherwise engage in or permit a bribery offence to occur, with the expectation or hope that an advantage in business will be received, or to reward a business advantage already given.

(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 a payment, 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 in return.

(d) threaten or retaliate against another employee or worker who has refused to commit a bribery offence or who has raised concerns under this policy.

(e) engage in any activity that might lead to a breach of this policy.

“Payment” - This includes any offer, promise or authorization to pay, anything of value including but not limited to, cash or cash equivalents, gifts, services, employment offers, loans, travel expenses, entertainment, political contributions, charitable donations, subsidies, per diem payments, sponsorships, honoraria or provision of any other asset, even if nominal in value.

“Gift” - This means any item of monetary value. These are commonly offered as gestures of gratitude or tokens of appreciation. The Company allows these tokens and gestures when they are reasonable, proportional, made in good faith while disclosing same to Compliance Officer. This includes the receipt or offer of gifts, meals or items of limited value as well as invitations to events, functions or other social gatherings related to the Company’s business.

“Hospitality” - Corporate hospitality (including business entertainment) being the legitimate way of building business relationships can amount to a bribe if lavish in certain circumstances, while appropriate, reasonable and genuine hospitality are allowed. It is generally recognized that the value of appropriate hospitality may be higher than the value of an appropriate gift.

“Donation” - Any political, community and charitable contributions are prohibited by this policy and should not be made.

Non-compliance with the policy may result criminal or civil penalties which will vary according to the offence. An employee acting in contravention of the policy will also face disciplinary action up to and including summary dismissal.

## **7. Red flags**

The following is a list of "red flags" that may indicate the possible existence of corrupt practices and should be kept in mind by all those subject to this policy:

- (c) Cash payments, or payments made without a paper trail or without compliance with normal internal controls.
- (d) Unusual bonuses to foreign personnel for which there is little supporting documentation.
- (e) Payments to be made through third party accounts.
- (f) Private meetings requested by customers or companies hoping to tender for contracts.
- (g) Not following AFPLC policies or procedures – abusing the decision-making process.
- (h) Unexplained preferences for certain customers

This list is not exhaustive and you should be alert to other indicators that may raise a suspicion of corrupt activity.

## **8. Responsibilities under the policy**

All directors, senior management, employees, consultants and contractors of AFPLC must participate in all related training provided by the company.

The prevention, detection and reporting of bribery offences and other forms of corruption are the responsibility of all those working for AFPLC. All such persons are required to avoid any activity that might lead to, or suggest, a breach of this policy.

If you are asked to make a relationship on the Company's behalf, you should always be mindful of what the relationship is for and whether the relationship requested is proportionate to the services provided. If you have any suspicions, concerns or queries regarding the relationship, you should raise these with the Compliance Officer, wherever possible, prior to taking any action.

All directors, officers, employees, consultants and contractors of AFPLC must notify the Compliance Officer or make a disclosure as soon as possible if they believe or suspect that an action in conflict with this policy has occurred, or may occur in the future, or has been solicited by any person.

Any person who breaches this Policy will face disciplinary action, which could result in dismissal for gross misconduct.

## **9. Associated entities**

It is a violation of the Policy to make any corruption or bribery through any subsidiaries, agents, business partners, customers or suppliers (individuals or organizations) of AFPLC.

The relationship with agents, business partners, customers or suppliers must be fully documented using the Company's standard terms and conditions, which shall include compliance with the policy and prohibit making or receiving any bribes on the company's behalf.

## **10. Record-keeping**

Company will be required to develop, implement, monitor and maintain a system of internal controls to facilitate compliance with this policy, as well as to foster a culture of integrity and maintain high ethical standards throughout the company.

Company must keep financial records and have appropriate internal controls in place which will evidence the business reason for, for a period of 6 years.

All transactions must be executed in accordance with management's general or specific authorization. Transactions must be recorded as necessary to permit preparation of financial statements in conformity with Financial Reporting Standards, for a period of 6 years.

All business partners of the Company should have in place internal controls and procedures that fit these criteria and enhance compliance with this policy.

The Company will maintain accurate books and records that fairly document all financial transactions, risk assessments and due diligence available for inspection.

To ensure the effectiveness of internal controls, business and finance personnel of the Company will review transactions and expense/payment requests for warning signs that signal breach of policy or excessive risks.

## **11. Responsibility for the policy**

The company's Board of Directors has overall responsibility for ensuring this policy complies with AFPLC legal and ethical obligations, and that all those under AFPLC control comply with it.

The Compliance Officer has primary and day-to-day responsibility for implementing this policy, and for monitoring its use and effectiveness. Management at all levels is responsible for ensuring those reporting to them are made aware of and understand this policy.

## **12. Monitoring and review**

The Compliance Officer will monitor the effectiveness and review the implementation of this policy, considering its suitability, adequacy and effectiveness. Any deficiencies identified will be rectified as soon as possible.

Internal control systems and procedures will be subject to audits to provide assurance that they are effective in countering bribery and corruption.

All directors, senior management, employees, consultants and customers of AFPLC are responsible for the success of this policy and should ensure they follow the procedures set out herein to disclose any suspected wrongdoing.

## **13. Policy reviewing frequency**

This Policy shall be reviewed at 2 years, to ensure it is in accordance with the laws, Directions and guidelines issued by regulatory authorities.

## **14. Consequences of non-compliance with the policy**

Failure to comply with this policy may result in severe consequences, which could include internal disciplinary action or termination of employment without notice. Violation of this policy may also constitute a criminal offence. If it appears in the opinion of the Board that any director, senior management, employee, consultant or customer of AFPLC may have violated such laws, then AFPLC may refer the matter to the appropriate regulatory authorities, which could lead to civil or criminal penalties for AFPLC and/or the responsible person.

## **15. Policy reviewing frequency**

This Policy shall be reviewed at least two years, to ensure it is in accordance with the Laws, Directions and Guidelines issued by Regulatory Authorities.