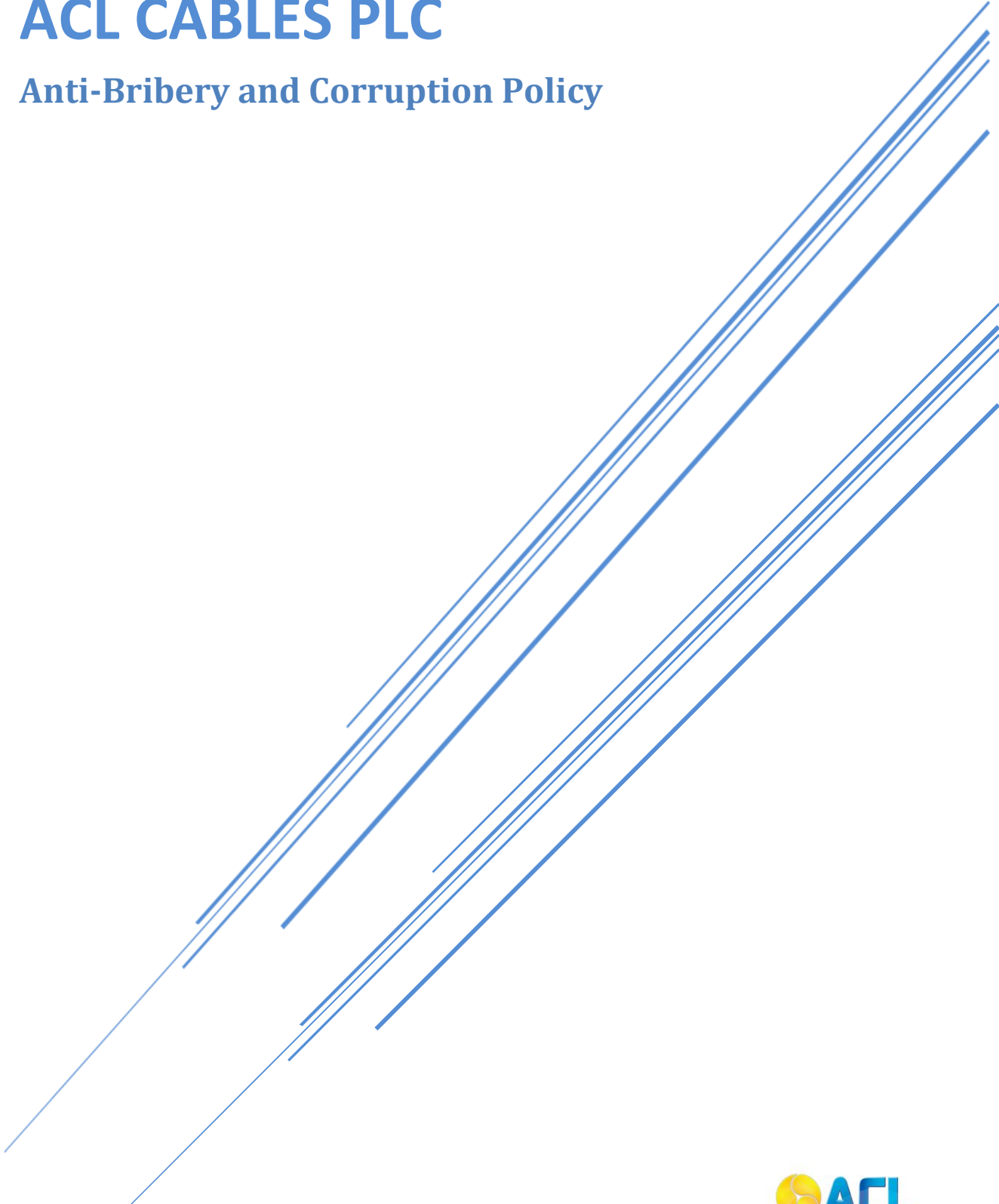


ACL CABLES PLC

Anti-Bribery and Corruption Policy



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1. Purpose:

The purpose of this Anti-Bribery and Corruption Policy is to outline ACL Cable's commitment to conducting business ethically, with integrity, and in compliance with all applicable anti-bribery and corruption laws. This policy aims to prevent bribery and corruption in all aspects of the organization's operations.

2. Scope:

This policy applies to all directors, officers, employees, contractors, consultants, and any third parties acting on behalf of ACL Cables PLC.

3. Compliance with Laws:

ACL Cables PLC is committed to complying with all applicable anti-bribery and corruption laws, including but not limited to the Commission to Investigate Allegations of Bribery or Corruption Act, No. 19, of 1994, and other relevant national and international laws.

4. Definition of Bribery and Corruption:

Bribery:

Bribery is the offering, giving, receiving, or soliciting of anything of value, directly or indirectly, to influence the actions of an individual or entity.

Corruption:

Corruption involves the abuse of entrusted power for private gain, which may include bribery, embezzlement, fraud, or other unethical conduct.

5. Prohibited Conduct:

Bribery of Public Officials:

No employee or representative of ACL Cables PLC shall offer, promise, give, request, or accept any bribe, kickback, or inappropriate payment to or from any government official, public servant, or any individual or entity acting on behalf of a public body.

Commercial Bribery:

ACL Cables PLC prohibits the offering, giving, receiving, or soliciting of bribes or corrupt payments in the private sector, including interactions with customers, suppliers, and business partners.

6. Facilitation Payments:

Prohibition:

Facilitation payments, often referred to as "grease payments," are strictly prohibited. No employee shall make or authorize such payments.

7. Gifts, Entertainment and Hospitality:

Guidelines:

ACL Cables PLC recognizes that business relationships often involve the exchange of gifts, entertainment, and hospitality. While these practices are common and can contribute to relationship-building, it is crucial that they are conducted ethically and do not compromise the organization's commitment to anti-bribery and corruption principles.

All employees should exercise caution and good judgment when giving or receiving gifts, entertainment, or hospitality in a business context.

Gifts, entertainment, and hospitality should be reasonable, modest, and consistent with local customs and cultural norms.

No employee should offer or accept gifts, entertainment, or hospitality that could be perceived as an attempt to gain an improper business advantage.

Gifts:

Definition: A gift is any item, favor, or token of appreciation given or received in a business context. This includes, but is not limited to, merchandise, vouchers, or any other tangible or intangible items.

Acceptance Criteria:

Gifts of nominal value and promotional items are generally acceptable.

Employees should not accept cash or cash equivalents, as well as gifts that may create a sense of obligation.

8. Third-Party Due Diligence:

Vetting of Business Partners:

ACL Cables PLC will conduct due diligence on third parties, including agents, intermediaries, and business partners, to ensure that they adhere to anti-bribery and corruption standards.

9. Reporting Suspected Violations:

Whistleblower Protection:

Employees are encouraged to report any suspected violations of this policy through established reporting channels. ACL Cables PLC prohibits retaliation against individuals who make good-faith reports.

10. Consequences of Violations:

Disciplinary Actions:

Violations of this policy may result in disciplinary actions, up to and including termination of employment or contractual relationships. Individuals may also be subject to civil or criminal prosecution.

11. Training and Communication:

Training Programs:

ACL Cables PLC will provide periodic anti-bribery and corruption training to all employees and relevant third parties to ensure awareness and understanding of this policy.

Communication:

This policy will be communicated to all employees and third parties, and updates or changes will be promptly communicated.

12. Record-Keeping:

Documentation:

ACL Cables PLC will maintain accurate records of all transactions and dealings to demonstrate compliance with anti-bribery and corruption laws.

13. Review and Updates:

Periodic Review:

This policy will be subject to periodic reviews to ensure its continued relevance and effectiveness. Updates will be made as necessary to reflect changes in laws or organizational practices.