

Anti-bribery Policy

Avorix International and its respective subsidiaries and associate companies (hereinafter referred to as “Avorix”, or “Company”), are committed to conducting business in accordance with the highest ethical standards and prohibits all forms of bribery and corruption. This Anti-Bribery Policy (Global) (“Policy”) prohibits bribery of government officials as well as private sector (commercial) bribery, including the offering, promising, authorizing or providing anything of value to any customer, business partner, vendor or other third party in order to induce or reward the improper performance of an activity connected with our business.

Purpose of policy

This Policy is intended to outline the Company’s risks related to bribery and corruption, to highlight your responsibilities under both the relevant anti-corruption laws and Company policies, and to provide you with the tools and support necessary to identify and combat anti-corruption risks. Either a violation of this Policy or the Company’s Code of Business Conduct (“COBC”) could result in disciplinary actions including, but not limited to, termination of employment.

Risks and/or consequences of non-compliance

A violation of relevant anti-corruption laws can lead to severe civil and criminal penalties and reputational harm to our Company. Company employees that violate these laws can also face severe civil and criminal penalties, including jail time. The prohibition against bribery is incorporated into our COBC; thus, a violation of this Policy could also result in disciplinary actions pursuant to our COBC including, but not limited to, termination of employment.

Scope and range of application

Avorix expects all employees, officers, directors, and third parties working on its behalf to refrain from engaging in any form of bribery or corruption, irrespective of citizenship, domicile, or location.

Gifts, entertainment, hospitality and travel

This Policy does not prohibit normal business hospitality, so long as it is reasonable, appropriate, modest and bona fide corporate hospitality. Some examples of acceptable gifts and/or benefits are as follows:

- (a) token gifts offered in business situations or to all participants and attendees for example, work related seminars, conferences, trade and business events;
- (b) gifts presented at work-related conferences, seminars and/or business events;
- (c) gifts given in gratitude for hosting business events, conferences and/or seminars;
- (d) refreshments or meals during meetings or as participants of work-related conferences and/or seminars; and
- (e) meals for business purposes.

As a general principle, you should not accept or give a gift to a third party if it is made with the intention of influencing the third party to obtain or retain business, or in exchange for favours or benefits. In addition, lavish or unreasonable gifts or hospitality should not be accepted nor given as such gifts or hospitality may be perceived or interpreted as attempts by you to obtain or receive favourable business treatment for personal benefits and to avoid the perception of improper influence on the decision making of the recipient. Hence, the intention behind the gifts or hospitality should always be considered.

You shall ensure that all gifts, entertainment, hospitality and travel made are legal and ethical under local laws and practices, and that such expenses incurred are made in accordance with the Company’s approval mandate.

To avoid the reality, the appearance that business judgement may be improperly influenced or compromised and to protect the staff from any perception of improper conduct or conflicts of interest, employees should observe the following guidelines when deciding whether or not to accept gifts. Gifts, regardless an individual item or accumulated in value, are expected to be declared.

Where circumstances make it impossible, difficult or impractical to reject gift or where the rejection of the gift may affect the relationship with the customers or business associates (other than cash or cash equivalent) or rejecting them is deemed as offensive given the local custom, you may accept the gift(s). If accepted, it is deemed to have been accepted on behalf of the Company and become the property of the Company. The use of the gift is to be determined by the Director.

Consumables like food gifts and hampers at nominal value will not need to be declared but instead be shared within the company staff. You should obtain approval from his or her supervisor for business entertainment extended. As a guide, business meals are acceptable.

Facilitation Payments and Kickbacks

The Company does not accept and will not make any form of facilitation payments of any nature. We recognise that facilitation payments are a form of bribery that involves expediting or facilitating the performance of a public official for a routine governmental action. We recognise that they tend to be made by low level officials with the intention of securing or speeding up the performance of a certain duty or action.

The Company does not allow kickbacks to be made or accepted. We recognise that kickbacks are typically made in exchange for a business favour or advantage.

Political Contributions

The Company will not make donations, whether in cash, kind or by any other means, to support any political parties or candidates. We recognise this may be perceived as an attempt to gain an improper business advantage.

Charitable Contributions

Charitable support and donations are acceptable (and indeed are encouraged), whether of in-kind services, knowledge, time, or direct financial contributions. However, you must be careful to ensure that charitable contributions are not used as a scheme to conceal bribery. No donation can be offered or made without the prior approval of the Director.

Employee Responsibilities

As an employee of the Company, you must ensure that you read, understand and comply with the information contained within this Policy, and with any training or other anti-bribery and corruption information you are given from time to time.

Employee's that are assigned to support client companies projects shall comply with the Company's Policy along with any related Anti Bribery and Corruption Policies of the client companies.

All employees and those under our control are equally responsible for the prevention, detection and reporting of bribery and other forms of corruption. They are required to avoid any activities that could lead to, or imply, a breach of this Policy.

If you have reasons to believe or suspect that an instance of bribery or corruption has occurred or will occur in the future that breaches this Policy, you must Report to any of the Company's Director.

If any employee breaches this Policy, the employee will face disciplinary action and could face dismissal for gross misconduct. The Company has the right to terminate a contractual relationship with an employee if the employee breaches this Policy. Further legal action may also be taken in the event that the Company's interests have been harmed as a result of non-compliance.

Training and communication

The Company will provide training on this Policy as part of the induction process for all employees. Employees will also receive regular, relevant training on how to adhere to this Policy.

The Company's Anti-Bribery and Corruption Policy and zero-tolerance stance shall be clearly communicated to all suppliers, contractors, business partners and any third parties at the outset of business relations, and as appropriate thereafter.

Monitoring, reviewing and enforcement

The Company is committed to continually improving its Policy and to develop further integrity measures and enhance its anti-bribery and anti-corruption procedures.

This Policy does not form part of an employee's contract of employment and the Company may amend it at any time so as to improve its effectiveness at combatting bribery and corruption.