



ANTI CORRUPTION AND BRIBERY POLICY

Alpha Nero FZ LLC takes a zero-tolerance approach to bribery and corruption and we are committed to conducting our business, wherever in the world, in an honest and ethical manner.

Alpha Nero is committed to:

- ✓ Conducting business in an honest way and without the use of corrupt practices or acts to gain an unfair advantage in all of its operations.
- ✓ To the highest legal and ethical standards and integrity which must be reflected in every element of what we do.
- ✓ Every employee or person acting for or on behalf of Alpha Nero is responsible for maintaining the highest standards of business conduct.
- ✓ Identify risk in the specific areas in which we face bribery and corruption risks and take proper control measures to mitigate these risks and thereby protect ourselves.
- ✓ All employees and those representing Alpha Nero must ensure that all expense claims relating to hospitality, gifts or expenses incurred to third parties are submitted in accordance the established expense policies of the relevant business units.
- ✓ Transparent in financial reporting and maintain an effective system of internal control and monitoring of our transactions.
- ✓ Maintain records and reasons of expenditure such as all accounts, invoices, memoranda and other documents and records relating to dealings with third parties. Eg: Customers, Suppliers and business contracts, should be prepared and maintained with strict accuracy and completeness.
- ✓ Not to have any accounts outside of Alpha Nero's accounting system to facilitate or conceal illegal or unethical payments.
- ✓ **Facilitation Payments:**
 - Alpha Nero does not allow its employees or its representatives to make, or accept, facilitation payments of any kind. Facilitation payments are usually small payments (or gifts) made to public officials in order to speed up or facilitate actions that the officials are already duty bound to perform.
- ✓ Make charitable donations that are legal and ethical under local laws and practices.
- ✓ Corporate Entertainment, Gifts, Hospitality and Promotional Expenditure Gifts, entertainment, hospitality and promotional expenditure includes both the receipt and offer of gifts, meals or tokens of appreciation and gratitude, or invitations to events, functions, or other social gatherings, in connection with matters related to our business. These are acceptable provided they fall within reasonable bounds of value and occurrence.

- ✓ Request Employees and associated persons to assist the Company and to remain vigilant in preventing, detecting and reporting bribery.
- ✓ Encourage Employees and associated persons to report any concerns related to bribery that they may have to the Top Management at the earliest.
- ✓ Investigate and take action for any instances of alleged or suspected bribery.
- ✓ Report any matter to the relevant public and/or legal authorities.
- ✓ Comply with laws relevant to countering bribery and corruption in the region which we operate.
- ✓ Alpha Nero will monitor the effectiveness and review the implementation of this policy, considering its suitability, adequacy and effectiveness. Improvements identified will be made as soon as possible.
- ✓ This policy is applicable to all its employees, consultants or any person or organization acting on its behalf and communicated to the same.
- ✓ Any breach of this policy will be regarded as a serious disciplinary, contractual and potentially criminal matter for the individual concerned as this in turn may cause serious damage to the reputation of Alpha Nero.
- ✓ The Top Management will periodically review this Anti-Corruption and Bribery Policy.

This policy does not prohibit

- ✓ Normal or appropriate hospitality and entertainment with clients
- ✓ The use of any recognised fast-track process that is publicly available on payment of a fee.

It is important that all such practices are proportionate, reasonable and made in good faith. Clear records must be kept at all times. In particular the following should be reported:

- ✓ Requests for cash payments whether direct or via a third party
- ✓ Reimbursement of unsubstantiated expense whether direct or via a third party
- ✓ Personal or business ties that an employee, representative or joint venture partner may have with government or corporate officials, directors or employees
- ✓ History of corruption in the country in which the work is being undertaken
- ✓ Lack of invoices and acceptable financial practices.

Managing
Director



ALPHA NERO FZ LLC	POLICY	19/03/2020	Page 2 of 2
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