



# ANTI-BRIBERY POLICY





## WHAT IS A BRIBE?

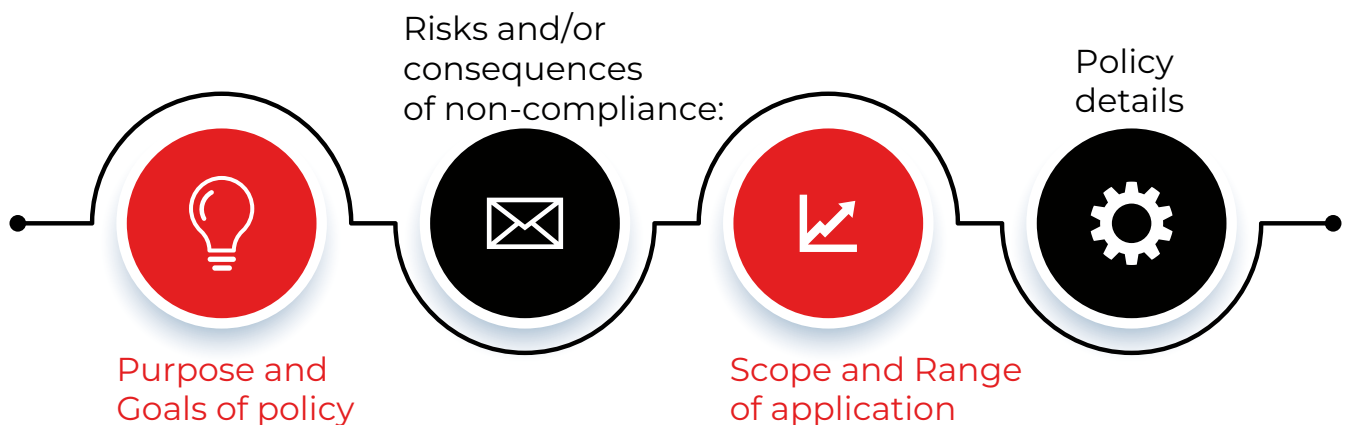
A 'Bribe' is defined as directly or indirectly paying, seeking, accepting or offering a payment, favor or gift to influence any form of business decision.

### POLICY SUMMARY

Our success hugely depends upon the trust and confidence of our clients across the globe. The Company is therefore committed to conducting business in accordance with the highest ethical standards and prohibits all forms of bribery and corruption.

This Anti-Bribery Policy prohibits bribery in any form 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.

A violation of this Policy could result in disciplinary actions including, but not limited to, termination of employment. It is therefore vital that you not only understand and appreciate the importance of this Policy, but also comply with it in your daily work. If you have any questions about this Policy or applicable Anti-Bribery laws generally, contact Company Legal





# POLICY SUMMARY

## 1. Purpose and Goals 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 those anti-corruption risks.

## 2. Risks and/or consequences of non-compliance:

A violation of relevant anti-corruption laws can lead to severe civil and criminal penalties and will greatly affect the reputation of our company which we intend to uphold. Company employees that violate these laws can also face severe civil and criminal penalties.

## 3. Scope and Range of application:

At Reporthub, we expect 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.

## 4. Policy details:



**4.1**  
Applicable  
Laws



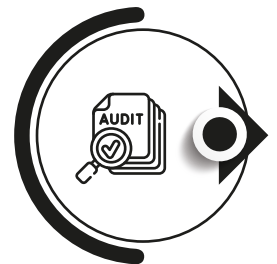
**4.2**  
Prohibition  
of Bribery



**4.3**  
Third-Party  
Management



**4.4**  
Training



**4.5**  
Auditing





## POLICY DETAILS:

### 4.1. Applicable Laws -

Employees of the Company must abide by all applicable Anti-Bribery laws, including international and the local laws in every country in which we do business. Virtually every country in which we operate prohibits bribery. These laws generally prohibit both bribery of government officials and private sector (commercial) bribery.

### 4.2. Prohibition of Bribery

#### 4.2.1. Anti-Bribery –

ReportHub Limited and its employees are prohibited from giving, promising, offering, or authorizing payment of anything of value to any government to obtain or retain business, to secure some other improper advantage, or to improperly influence a government official's actions. In addition, the Company prohibits employees from offering or providing corrupt payments and other advantages to or accepting the same from private persons and entities. Such payments constitute commercial bribery and are often called “kickbacks.”

#### 4.2.2. Facilitation Payments –

ReportHub Limited prohibition on bribery applies to all improper payments regardless of size or purpose, including facilitating payments. Facilitating payments refer to small payments to government officials to expedite or facilitate non-discretionary actions or services. Generally, facilitation payments are prohibited by this Policy, except for a very limited set of circumstances for which prior written approval must be provided by the legal counsel.

#### 4.2.3 Gifts, Meals, Travel and Entertainment (“GME”) -

It is never permissible to provide gifts, meals, travel, or entertainment to anyone (government officials or commercial partners) in exchange for any improper favor or benefit. In addition, gifts of cash or cash equivalents, such as gift cards, are never permissible.

#### 4.2.4. Donations -

It is never permissible to provide a donation in exchange for any improper favor or benefit. It may, however, be permissible to make donations directly to a government agency (rather than to an individual government official) as part of a charitable effort. Prior approval is required before making such a donation.





## POLICY DETAILS:

### 4.2.5. Hiring or Engaging Government Officials -

It is never permissible to hire or engage a government official, or his or her immediate family members, to improperly influence the official, or in exchange for any improper favor or benefit. Note that before hiring a government official (or relative thereof) Company associates must first receive legal approval.

### 4.2.6. Political Contributions -

It is never permissible to provide a political contribution to improperly influence a government official, or in exchange for any improper favor or benefit.

## 4.3. Third-Party Management

### 4.3.1. Applicability to Third Parties -

Third-party agents, consultants, or any other third-party representatives acting for or on behalf of the Company (collectively, "third parties") are prohibited from making corrupt payments on the Company's behalf. This prohibition also applies to subcontractors hired by third parties to perform work on the Company's behalf. Any and all payments made to third parties, including commissions, compensation, reimbursements, must be customary and reasonable in relation to the services provided and accurately documented in the Company's books and records.

Once a third-party agent or consultant has been retained by the Company, the third party's activities and expenses must be monitored by the relevant Company employee to ensure continued compliance with the applicable anti-corruption laws and Company policies

## 4.4. Training

The Company requires that all managers and all other employees complete Anti-Bribery training every other year:

The required Anti-Bribery training may include in-person or online code of conduct training, a web-based Anti-Bribery training course, or instructor-led training programs. If a Company associate is assigned an online training course, he or she must complete that online course regardless of whether they have also received in-person training.





## POLICY DETAILS:

### 4.5. Auditing

Company employees will conduct periodic internal audits of relevant Company operations to help ensure the Company's continued compliance with applicable Anti-Bribery laws and this Policy.

It is the duty of all employees to cooperate with—and never interfere with or obstruct—such audit activities or Company investigations. Company auditors are expected to act independently, and to liaise with Company Legal Counsel to clarify any questions related to application of this Policy.

### 4.6. Reporting Violations

If you observe conduct that may violate this Policy, contact Company Legal Counsel or email us at [info@reporthub.co.ke](mailto:info@reporthub.co.ke). Suspected violations will be reviewed and investigated as appropriate and may lead to disciplinary action. Any such reporting will be treated as confidential to the extent permitted by law.

The Company strictly prohibits retaliation for good faith reports of suspected misconduct. Failure to report a violation of this Policy constitutes an independent violation of this Policy and the code of conduct that is subject to discipline, up to and including termination of employment.



**CHIEF EXECUTIVE OFFICER**

Date signed, May 2019.....



**REPORTHUB**

*Information with Power*

