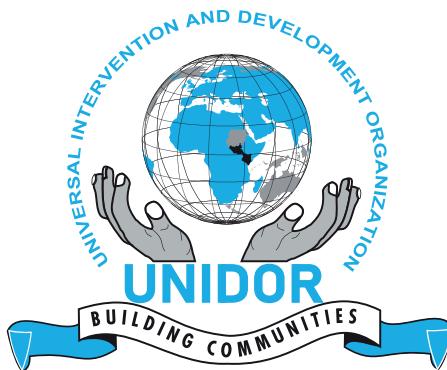


UNIVERSAL INTERVENTION AND DEVELOPMENT ORGANIZATION

UNIDOR ANTI-CORRUPTION POLICY STATEMENT REVISED 2021



Universal Intervention and Development Organization (UNIDOR)

UNIDOR ANTI-CORRUPTION POLICY STATEMENT REVISED 2021

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UNIDOR ANTI-CORRUPTION POLICY STATEMENT

It is our policy to conduct all of our business in an honest and ethical manner. We 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 wherever we operate and will implement and enforce effective systems to counter bribery.

Bribery and corruption are punishable for individuals by up to ten years' imprisonment and if the Entity is found to have taken part in corruption it could face an unlimited fine, be excluded from tendering for public contracts and face damage to our reputation.

A single act of bribery or corruption can lead to criminal charges and fines for individuals and the Company in multiple countries. We therefore take our legal responsibilities very seriously.

WHAT IS BRIBERY?

A bribe is an inducement or reward offered, promised or provided in order to gain any commercial, contractual, regulatory or personal advantage.

EXAMPLES:

- Offering a bribe. You offer a potential client tickets to a major sporting event, but only if they agree to do business with us. This would be an offence as you are making the offer to gain a commercial and contractual advantage. We may also be found to have committed an offence because the offer has been made to obtain business for us. It may also be an offence for the potential client to accept your offer.
- Receiving a bribe. A supplier gives your nephew a job, but makes it clear that in return they expect you to use your influence in our organization to ensure we continue to do business with them. It is an offence for a supplier to make such an offer. It

would be an offence for you to accept the offer as you would be doing so to gain a personal advantage.

- Bribing a foreign official. You arrange for the business to pay an additional payment to a foreign official to speed up an administrative process, such as a request for a visa or work permit. Because this offer is made to gain a business advantage for us, the offence of bribing a foreign public official has been committed as soon as the offer is made.

GIFTS AND HOSPITALITY

This policy does not prohibit normal and appropriate hospitality (given and received) to or from third parties provided that such hospitality is given or received in accordance with the entity's Hospitality Policy and provided that the following requirements are met: not made with the intention of influencing a third party to obtain or retain business or a business advantage, or to reward the provision or retention of business or a business advantage, or in explicit or implicit exchange for favors or benefits; complies with local law; Abridged Anti-Corruption Policy, given in the Company's name, not in your name, does not include cash or a cash equivalent (such as gift certificates or vouchers), appropriate in the circumstances. For example, in the UK it is customary for small gifts to be given at Christmas time; takes into account the reason for the gift, of an appropriate type and value and given at an appropriate time. In the United States, Federal, State and local government employees are subject to rules that may prohibit such employee from receiving any gifts or hospitality of value.

- **Facilitation payments and kickbacks** We do not make, and will not accept, facilitation payments or 'kickbacks' of any kind. Facilitation payments are typically small, unofficial payments made to secure or expedite a routine government action by a government official. They are not commonly paid, but are common in some other jurisdictions in which we operate. If you

are asked to make a payment on our behalf, you should always be mindful of what the payment is for and whether the amount requested is proportionate to the goods or services provided. You should always ask for a receipt which details the reason for the payment.

- **Protection money** In some parts of the world ‘protection’ is offered. This is a form of extortion which may involve physical threats. We will not pay protection money and you must report any such requests immediately. We have an obligation to ensure the safety and wellbeing of our employees, partners and agents and in certain circumstances may cease business in that territory or country.
- **Actions you should take** Record keeping and reporting. It is important that you keep records of any actions that could potentially be interpreted as bribery. This ensures that there is an appropriate paper trail to refer to in the event of prosecution. Likewise, report any actions to your manager and/or to the Anti-Corruption Compliance Team.
- **Responsibilities for enforcement.** Managers are responsible for ensuring their teams are fully informed of policy requirements. Managers are also responsible for adopting and enforcing appropriate controls and taking the steps necessary to ensure compliance with this policy by all employees, distributors, and consultants.

HOW TO RAISE A CONCERN

If you have any doubt or concern about any situation relating to the policy, seek guidance from the Department Head before doing or omitting to do anything that could compromise your position within the Company.

If any department head should require further guidance on a specific case then this should be referred to the Executive Director.

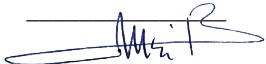
WHAT TO DO IF YOU ARE A VICTIM OF BRIBERY OR CORRUPTION

It is important that you tell your immediate supervisor as soon as possible if you are offered a bribe by a third party, are asked to make one, suspect that this may happen in the future, or believe that you are a victim of another form of unlawful activity. Bribery is a zero tolerance when confirm after careful investigation the management take decision to terminate the staff involved in such practice

Dr. Makena Kaburu
Chairperson BOD



Robert Bother
Treasury



James Keah
Secretary/ED



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