

LOGIX
ANTI-CORRUPTION
AND
BRIBERY POLICY

1. POLICY STATEMENT

- 1.1 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 relationships and business dealings wherever we operate and to implementing and enforcing effective systems to counter bribery.
- 1.2 We will uphold all laws relevant to countering bribery and corruption. We remain bound by the laws of Uganda, in respect of our operational conduct.
- 1.3 The purpose of this policy is to:
- (a) Set out our responsibilities, and of those working at Logix, in observing and upholding our position on bribery and corruption.
 - (b) Provide information and guidance on how to recognize and deal with bribery and corruption issues.
- 1.4 Bribery and corruption are punishable for individuals by imprisonment and if we are found to have taken part in corruption act the company could face an unspecified fine and damage to our reputation. We therefore take our legal responsibilities very seriously.
- 1.5 We understand that certain aspect of our activities create particular risks for our organization, in particular:
- (a) Joint ventures and partnerships (whether formal or informal);
 - (b) Receipt of gifts and donations;
 - (d) Procurement processes
- 1.6 To address these risks we have taken the following steps:
- (a) Implement an anti-bribery and corruption policy;
 - (b) Undertaken a risk assessment exercise, which will be subject to on- going review;
 - (c) Undertaken a training programme of senior management;
 - (d) Prepared standard clauses relating to Bribery Act issues for inclusion in key contractual documentation.
- 1.7 In this policy, **third party** means any individual or organisation you come into contact with during the course of your work for us, and includes actual and potential clients, customers, suppliers, distributors, business contacts,

agents, advisers, and government and public bodies, including their advisors, representatives and officials, politicians and political parties.

2. WHO IS COVERED BY THE POLICY?

This policy applies to all individuals working at all levels within Logix, including senior managers, directors, employees (whether permanent, fixed-term or temporary), consultants, contractors, trainees, seconded staff, casual workers and agency staff, volunteers, interns, or any other person associated with us, or any of their employees, wherever located (collectively referred to as **workers** in this policy).

3. 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.

4. HOSPITALITY AND GIFTS

4.1 This policy does not prohibit normal and appropriate hospitality (given and received) to or from third parties and the giving or receipt of gifts, provided that this is done in accordance with Regulations.

4.2 Normal and appropriate hospitality and gifts would include where the hospitality or gift:

- (a) Is 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 favours or benefits;
- (b) Complies with local law;
- (c) Is given in Company name and not person/private;
- (d) Does not include cash or a cash equivalent (such as gift certificates or vouchers);
- (e) Is appropriate in the circumstances. For example, it is customary for small gifts to be given at Christmas time;
- (f) Taking into account the reason for the gift, and confirming that it is of an appropriate type and value and given at an appropriate time;
- (g) Is given openly, not secretly.

5. WHAT IS NOT ACCEPTABLE?

It is not acceptable for you (or someone on your behalf) to:

- (a) give, promise to give, or offer, a payment, gift or hospitality with the expectation or hope that a business advantage will be received, or to reward a business advantage already given;
- (b) give, promise to give, or offer, a payment, gift or hospitality to a government official, agent or representative to "facilitate" or expedite a routine procedure;
- (c) accept payment from a third party that you know or suspect is offered with the expectation that it will obtain a business advantage for them;
- (d) accept a gift or hospitality from a third party if you know or suspect that it is offered or provided with an expectation that a business advantage will be provided by us in return;
- (e) threaten or retaliate against another worker who has refused to commit a bribery offence or who has raised concerns under this policy; or
- (f) engage in any activity that might lead to a breach of this policy.

6. FACILITATION PAYMENTS AND KICKBACKS

6.1 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 process with government, client or supplier that the company is dealing with at a specific time.

6.2 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. Such and all payments must be receipted with details and the reason for such payment.

6.3 Kickbacks are typically payments made in return for a business favour or advantage. All workers must avoid any activity that might lead to, or suggest, that a facilitation payment or kickback will be made or accepted by us.

8. YOUR RESPONSIBILITIES

- 8.1 You must ensure that you read, understand and comply with this policy.
- 8.2 The prevention, detection and reporting of bribery and other forms of corruption are the responsibility of each member of staff. All staff are strongly advised and are required to avoid any activity that might lead to, or suggest, a breach of this policy.
- 8.3 Any employee who breaches this policy will face disciplinary action, which could result in dismissal for gross misconduct.

9. Transparency

- 9.1 Financial records must be kept at all times and have appropriate internal controls in place clearly showing evidence of business reason for making payments to third parties.
- 9.2 Declaration and keeping of written record of all hospitality or gifts accepted or offered, which will be subject to managerial review.
- 9.3 You must ensure all expenses claims relating to hospitality, gifts or expenses incurred to third parties are submitted in accordance with our expenses policies and specifically record the reason for the expenditure.
- 9.4 All accounts, invoices, and other documents and records relating to dealings with third parties, such as clients, suppliers and business contacts, should be prepared and maintained with strict accuracy and completeness. No accounts must be kept "off-book" to facilitate or conceal improper payments.

10. HOW TO RAISE A CONCERN

You are encouraged to raise concerns about any issue or suspicion of malpractice at the earliest possible stage. If you are unsure whether a particular act constitutes bribery or corruption, or if you have any other queries, these should be raised with your line manager and/or the Operations Manager.

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

It is important that you tell the Operations Manager or the MD 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.

12. PROTECTION

12.1 Workers who refuse to accept or offer a bribe, or those who raise concerns or report another's wrongdoing, are sometimes worried about possible repercussions. We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken.

13. COMMUNICATION

13.1 Our zero-tolerance approach to bribery and corruption must be communicated to all suppliers, contractors, agents and business and other partners at the outset of our relationship with them and as appropriate thereafter.

14. WHO IS RESPONSIBLE FOR THE POLICY?

14.1 The Managing Director/Directors and the Senior Management Team have overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those within the organization comply with it.

14.2 Each staff has the primary and day-to-day responsibility for implementing this policy in our various capacity, and as well as monitoring its use and effectiveness.

15. MONITORING AND REVIEW

15.1 All staff are responsible for the success of this policy and should ensure they use it to disclose any suspected danger or wrongdoing.

15.3 Workers are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries should be addressed to the Operations Manager.

15.4 This policy does not form part of any employee's contract of employment and it may be amended at any time.

Policy last updated January 2015