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|  | Integrated Management System | ISO 9001:2015 Clause: 5.1 |
| | Anti-bribery, Gifts, Hospitality & Entertainment Policy | |
| Identification No | AG/HRM/PR/025 | Revision Number: |
| Date of Issue | 01/09/2020 | Revision Date: |

1.0 Policy Statement

By establishing this policy, the Company places high importance on upholding responsible and fair business practices. It is committed to promoting and maintaining the highest level of ethical standards in relation to all of its business activities.

Its reputation for maintaining lawful business practices is of paramount importance and this Policy is designed to preserve these values. The Company therefore has a zero-tolerance policy towards bribery and corruption and is committed to acting fairly and with integrity in all of their business dealings and relationships and implementing and enforcing effective systems to counter bribery.

2.0 Scope

This policy applies to all employees.

3.0 Foreword

Anti-Bribery and Corruption Policy / Code of Conduct


The Company is dedicated to ensuring full compliance with all anti bribery and corruption laws and regulations, including the Prevention and Combating of Corruption ACT, 2007, by all of its employees. Generally, anti-bribery and corruption laws prohibit making payments or gifts to government officials or another person in a powerful position in order to secure any improper business advantage. Alistair Group understands the importance of eliminating bribery and corruption and the role that discouraging bribery and corruption plays in creating a safer, more stable political and business environment. It is Alistair's policy that no company officer, employee or agent may offer payments (or anything else of value) to a governmental official or potential client that will assist the Company in obtaining or retaining business or securing any improper business advantage.

Every Alistair officer, employee and agent is obligated to keep books, records and accounts that accurately and fairly reflect all transactions and the use of assets.

Alistair takes bribery and corruption very seriously, and any employee found to be violating this policy will be subject to disciplinary action, which may include termination.

The Company encourages their employees to report any violations or suspicious activity that is described below. An employee's failure to report known and suspected violations may lead to disciplinary action.

As the Company is operating in a very difficult business and political environment, it is constantly revising its training and procedures for addressing bribery and corruption in order to keep its employees and policies as compliant as possible.

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4.0 General Guidelines

- No payment or gift of any kind may be made, promised or offered to a government official, political candidate, employee of a government owned entity, or client.
- No gift of any kind may be received from any government official, political candidate, employee of a government owned entity, or client.
- Paying excessive travel and entertainment expenses on behalf of a government official or client to obtain or maintain business can be considered as bribes.
- An improper business advantage includes bribes to maintain existing business operations. For example, bribing an official to obtain or renew permits or certifications is illegal.
- Payments or gifts made at the request of a government official / client to obtain or maintain business are forbidden. For example, if a government official indicates that he will ensure his agency does business with you in exchange for buying goods from his cousin's company that transaction is considered a bribe and is forbidden.
- Payments made to an intermediary can be considered as bribes. Therefore, the companies require that thorough background checks be undertaken on all intermediaries and payments are fully receipted.
- Accurate books and records must be kept, and falsifying records to conceal a bribe is not allowed.

5.0 Gifts, Hospitality & Entertainment Rules

- Gifts, hospitality and entertainment could be perceived as bribery. For example, offering or accepting Gifts, Hospitality and Entertainment to an external party involved in a current tender, bid or other negotiation process could be perceived as a potential attempt to influence a business decision, or as causing a conflict of interest, therefore should not be received.
- Never offer or accept cash or cash equivalents as a gift under any circumstances.
- Obtain Legal department approval before offering to or accepting from an external party (i.e. supplier, customer, or other external party).
- Keep transparent & accurate records, all gifts and entertainment that you offer to or accept from external parties must be recorded in Gifts & Entertainment Register including offers you have made which have been declined.

6.0 Sponsorship Rules

- Sponsorship involves Alistair Group agreeing to have its name, products or services associated with the sponsored organization's activities for an agreed commercial benefit, such as brand building. Any sponsorship must obtain prior approval from Legal Department
- Community and charitable contributions should only be given to genuine charities to be used solely for charitable purposes; any charitable contributions must obtain prior approval from Legal.

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7.0 Red Flags

The following situations, among many other situations, could expose the Company and the individuals involved to a risk of violation, and need to be reported as set forth below:

- Requests or demands by a government official or client for a bribe
- Requests or suggestions by a government official or client that the Company make a charitable donation to a particular charity
- Requests by a government official or client for employment either on his or her own behalf or on behalf of another
- A government official or client who has a reputation for receiving questionable payments
- A request for an unusual or excessive payment, such as a request for over-invoicing, unusual up-front payments, unusual commissions, a request for payments to be made to a third party, to a foreign bank account, in cash or otherwise untraceable funds
- A proposed agent or representative refuses to provide written assurances that he or she will not make any improper payments

8.0 Reporting a Violation

Any transaction, regardless of the amount, may give rise to violations of anti-bribery and corruption laws and regulations and/or to the Group's policy. Thus, it is important that every employee understands the rules and reports any wrongdoing he or she notices as soon as possible. If an employee believes a violation is occurring, he or she should report it immediately to the Directors.




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Any employee, who, in good faith, lawfully and truthfully, seeks advice, raises a concern or reports misconduct is doing the right thing. No matter how he/she chooses to report, as long as the report is made honestly and in good faith, the Company will not take any retaliatory action against the employee.

Allegations of retaliation will be investigated and appropriate action taken.

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7.0 Authorisation and Review

| DOCUMENT AUTHORISATION | | |
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| Document Author | Document Reviewed By | Document Approved By |
| Yona Nyaguda | Anton Eppel | Alistair James |
| HR lead | Head of HR | Managing Director |
| 01/09/2020 | 01/09/2020 | 01/09/2020 |
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| REVISION HISTORY | | | | |
|------------------|------|-------------|--------|---------|
| Rev. No. | Date | Revision By | Reason | Details |
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