

ADCOS BUSINESS SUPPORT SERVICES LTD
ANTI-BRIBERY & CORRUPTION POLICY

1. Purpose ADCOS Business Support Services Ltd ("ADCOS") is committed to conducting business ethically and in compliance with all applicable laws, including anti-bribery and anti-corruption laws in Kenya and any other relevant jurisdictions. This policy aims to prevent bribery and corruption in all ADCOS dealings, particularly in engagements with Earthtree Company Limited and other partners.

2. Scope This policy applies to all employees, officers, directors, contractors, agents, and any third parties acting on behalf of ADCOS. It covers all business transactions, including procurement, contracts, partnerships, and vendor relationships.

3. Prohibited Conduct ADCOS strictly prohibits the following actions:

- Offering, giving, receiving, or soliciting bribes in any form, including money, gifts, favors, or undue advantages.
- Making facilitation payments to expedite official processes.
- Providing political contributions, charitable donations, or sponsorships intended to improperly influence business decisions.
- Engaging in any activity that may be perceived as corrupt or unethical.

4. Compliance with Laws ADCOS and its employees shall comply with the Anti-Corruption and Economic Crimes Act (Kenya) and other applicable anti-bribery laws. All dealings with government officials, business partners, and third parties must be transparent and compliant with legal requirements.

5. Due Diligence & Reporting

- Before engaging with any third party, ADCOS will conduct due diligence to assess their integrity and compliance with anti-bribery laws.
- Employees must report any suspected bribery or corruption incidents through the designated internal channels.
- No employee shall face retaliation for refusing to participate in corrupt activities or for reporting violations in good faith.

6. Training & Awareness ADCOS will provide training and awareness programs to employees and relevant stakeholders to ensure adherence to anti-bribery regulations and ethical business practices.

7. Penalties for Non-Compliance

- Any employee found guilty of violating this policy will face disciplinary action, including termination of employment.
 - Third parties engaged in bribery or corrupt practices will face contract termination and potential legal action.
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