



## **ANTI BRIBERY AND CORRUPTION POLICY**

Slimburg Limited is committed to conducting its business ethically and in compliance with all applicable laws and regulations, including the Economic and Financial Crimes Commission, Independent Corrupt Practices and other Related Offences Commission, and similar laws in other countries that prohibit improper payments to obtain a business advantage.

This document describes Slimburg's Policy prohibiting bribery and other improper payments in the conduct of Slimburg business operations and employee responsibilities for ensuring implementation of the Policy. Questions about the Policy or its applicability to particular circumstances should be directed to Miss Stephanie Anyiam.

Slimburg Limited strictly prohibits bribery or other improper payments in any of its business operations. This prohibition applies to all business activities, anywhere in the world, whether involving government officials or other commercial enterprises.

A bribe or other improper payment to secure a business advantage is never acceptable and can expose individuals and Slimburg Limited to possible criminal prosecution, reputational harm or other serious consequences. This Policy applies to everyone at Slimburg Limited, including all officers, employees and agents or other intermediaries acting on Slimburg Limited's behalf.

Each officer and employee of Slimburg Limited has a personal responsibility and obligation to conduct Slimburg's business activities ethically and in compliance with all applicable laws based on the countries wherein Slimburg does business. Failure to do so may result in disciplinary action, up to and including dismissal.

Improper payments prohibited by this policy include bribes, kickbacks, excessive gifts or entertainment, or any other payment made or offered to obtain an undue business advantage. These payments should not be confused with reasonable and limited expenditures for gifts, business entertainment and other legitimate activities directly related to the conduct of Slimburg's business.

Slimburg has developed a comprehensive program for implementing this Policy, through appropriate guidance, training, investigation and oversight. Miss Stephanie has overall responsibility for the program, supported by the executive leadership of Slimburg Limited. Miss Stephanie Anyiam is responsible for giving advice on the

interpretation and application of this policy, supporting training and education, and responding to reported concerns.

Our internal controls framework and system are designed to reduce fraudulent activities by giving priority to preventive and automated/application controls. Core processes are documented and reviewed periodically with focus on the identification and mapping of control-points, which are in turn regularly reviewed and tested for design and operating effectiveness.

We have an effective whistleblowing programme in place as part of our anti-fraud solution. There are two whistleblowing portals – one manned internally and another manned externally by an independent third party, altogether providing staff, vendors and the general public ample avenues to report suspected fraudulent activities. Tips from whistleblowing are thoroughly investigated and consequences handled in accordance with the Company's policy of zero tolerance to fraud, bribery and corruption.

Finally, strict adherence to corporate governance tenets starting with tone at the top and underpinned by strong Board oversight and executive management's firm stand on zero tolerance to fraud, bribery and corruption, altogether send the message loud and clear down the cadre that fraud is not allowed in Slimburg and cannot be rationalized.