



WEBIWISE DIGITAL SERVICE LIMITED

ANTI-CORRUPTION/BRIBERY POLICY

1. Introduction

WebiWise Digital Service Limited is committed to complying with all applicable laws in their operations, including, but not limited to the Nigeria Corrupt Practices and other Related Offences Act 2000 and Economic and Financial Crime Commission (EFCC Act 2004) and International Standard Anti-Bribery Act.

2. Scope

Acts of bribery or corruption are designed to influence an individual in the performance of their duty and incline them to act in a way that a reasonable person would consider to be dishonest in the circumstances.

Bribery can be defined as offering, promising or giving a financial (or other) advantage to another person with the intention of inducing or rewarding that person to act or for having acted in a way which a reasonable person would consider improper in the circumstances. Corruption is any form of abuse of entrusted power for private gain and may include, but is not limited to, bribery.

Bribes are not always a matter of handing over cash. Gifts, hospitality and entertainment can be bribes if they are intended to influence a decision.



3. Penalties

In accordance with the Corrupt Practices and other Related Offences Act 2000 in the Laws of the Federation of Nigeria, it is a punishable offence for an individual or employee to be involved in bribery and corruption. Under that Act, bribery by individuals is punishable by up to ten years' imprisonment and/or an unlimited fine. A conviction for a bribery or corruption related offence would have severe reputational and/or financial consequences for the company.

4. Due Diligence

To reduce the risk of problems under anti-corruption laws, the first and most critical step is to conduct and document an appropriate due diligence review of the background of potential agents, partners and investees before the business relationship is formed or the investment made. The inquiry should be especially probing if law or practical realities of the circumstances would make it difficult for the Company to sever the relationship or extract itself from the investment.

5. WebiWise Digital Service Limited Company's Policy

WebiWise will not tolerate bribery or corruption in any form. The company prohibits from paying, promising, authorizing, or offering to give anything of value, to any government official, political party, party official, or political candidate to cause that official to do or not to do any act in violation of his official function or to secure any improper advantage, whether in cash or in any other form:

- To or from any person or company wherever located, whether a public official or public body, or a private person or company;



- By any individual employee, director, business partners, agent, consultant, contractor or other person or body acting on the company's behalf;
- In order to gain any commercial, contractual, or regulatory advantage for the company in any way which is unethical or to gain any personal advantage, pecuniary or otherwise, for the individual or anyone connected with the individual.
- The company will investigate thoroughly any actual or suspected breach of this policy, or the spirit of this policy. Employees found to be in breach of this policy may be subject to disciplinary action which may ultimately result in their dismissal.

6. Employee Responsibility and How to Raise a Concern

The prevention, detection and reporting of bribery or corruption is the responsibility of all employees throughout the company. If you become aware or suspect that an activity or conduct which is proposed or has taken place is a bribe or corrupt, then you have a duty to report this.

7. Audits

Audits performed by our internal and external auditors help ensure compliance with established policies, procedures and controls. Audits also help identify potential weaknesses so they may be remediated promptly. All of us are required to cooperate fully with internal and external audits. This



means always providing clear and truthful information and cooperating fully during the audit process.

8. Fraud

Engaging in any scheme to defraud anyone — of money, property or honest services violates Company policy and the law and carries severe penalties. Those consequences apply to any dishonest or fraudulent activities, including misusing or stealing Company assets or falsifying a travel and entertainment expense report, among other violations.

The Company relies on its internal controls and the personal integrity of all its employees, contractors and directors to protect Company assets against damage, theft and other unauthorized use.

9. Compliance

WebiWise will implement procedures to ensure the Company's business associates and employee comply with the Code of Conduct as it applies to them. Company's business associates and employee who does not comply with the standards set forth in this policy may be subject to discipline in light of the nature of the violation (In line with the human resources procedure manual)

10. Conclusion:

This policy shall be reviewed regularly and may be updated from time to time.