

<b>ANTI-CORRUPTION POLICY AND ACTIVITIES</b>	
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<b>Date Prepared</b>	<b>Feb 10, 2020</b>
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Corruption is a form of dishonesty or criminal offense undertaken by a person or organization entrusted with a position of authority, to acquire illicit benefit or abuse of power for one's private gain.

The employee, by virtue of his employment, is bound not to betray that trust by seeking to gain any undue personal or pecuniary advantage (other than the rightful proceeds of employment) from his dealings with or for and in behalf of the Association. Employees maintain the highest standards of honesty and professional conduct. Seeking undue financial and material advantage from transactions with the Association is a breach of trust between the employee and the Association.

NATCCO MBAI values its reputation for ethical behavior and for financial probity and reliability. It recognizes that over and above the commission of any crime, any involvement in bribery will also reflect adversely on its image and reputation. Its aim therefore is to limit its exposure to bribery by:

- a. Setting zero tolerance for bribery and corruption as the risk appetite; and taking firm and vigorous disciplinary actions consistently against any breach to the appetite;
- b. Designating a Risk Committee to oversee the bribery and corruption risk;
- c. Setting reporting and escalation requirements and procedures to ensure relevant and meaningful management information;
- d. Setting of an escalation process in the event of alleged or suspicious bribery and corruption instances relating to NATCCO MBAI;
- e. Providing guidance on "Gifts and Hospitality (G&H)" not permitted in the context of anti-bribery and corruption; mandating a register to record G&H that are offered, accepted or rejected;
- f. Put in place a conflicts of interest policy to ensure the record of close relationships which could compromise impartial business dealings is properly maintained;
- g. Defining guidelines regarding donations, corporate social responsibilities and sponsorship, to ensure there are no instances of political donations made on behalf of NATCCO MBAI in the course of business; and charitable contributions and sponsorship are allowed only within agreed schemes and guidelines;
- h. Ensuring the employment, vetting and disciplinary procedures address the relevant bribery and corruption risks
- i. Ensuring that no facilitation payments are made, i.e. any payment that is made (except where included within a lawful and published tariff of general application) as an inducement to secure or expedite the performance of a routine or necessary action, to which the payer of the facilitation payment has a legal entitlement;
- j. Ensuring transactions and payments are recorded in the financial books accurately, completely and timely;
- k. To ensure that policies and control frameworks to mitigate bribery and corruption risks are appropriately maintained
- l. That in the event of doubt as to whether a potential act constitutes bribery, employees shall refer the matter to the top management before proceeding.

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**NATCCO MBAI Activities:**

- a. NATCCO MBAI must keep a Gifts and Entertainment Register (GER) to record gifts given to and received from external parties;
- b. Additional training for employees considered as "high risk" is conducted, as and when necessary; and
- c. All new hires are required to take and pass the ABC training prior to actual onboarding.