

COMPLIANCE POLICY



Anti-Bribery and Anti-Corruption Policy

Customs Clearance, Transit & Logistics — Ex-Grand Katanga, D.R. Congo

Document Title	Anti-Bribery and Anti-Corruption Policy
Document Owner	CORRIDEX SARL — Management
Version	1.0
Effective Date	[DATE]
Review Cycle	Annual, or upon regulatory change
Applies To	All employees, contractors, agents, and representatives of CORRIDEX SARL

1. Purpose

CORRIDEX SARL operates in an environment where customs clearance and border transit create frequent, direct interaction with government officials. This creates real exposure to bribery and corruption risk. This Policy sets out a zero-tolerance position: CORRIDEX does not offer, promise, give, request, or accept bribes in any form, anywhere, for any reason.

This Policy applies to all employees, directors, agents, and subcontractors acting on behalf of CORRIDEX, in all jurisdictions in which the Company operates, including the Democratic Republic of Congo, South Africa, Zambia, Tanzania, Zimbabwe, and Angola.

2. What Counts as Bribery or Corruption

Bribery is offering, giving, receiving, or soliciting anything of value to improperly influence an official act or business decision. It is not limited to cash — it includes gifts, hospitality, favours, employment offers, or any other benefit.

- Paying a customs official to overlook an inspection, expedite clearance outside normal process, or accept an inaccurate declaration.
- Paying a border official "facilitation fees" or unofficial "fast-track" charges not covered by a receipted, lawful tariff.
- Offering a gift, cash, or favour to a client's procurement staff to win or retain business.
- Accepting a kickback from a transport subcontractor in exchange for awarding them business.
- Using a third party (an agent, "facilitator," or family member) to make a payment that the Company itself could not lawfully make.

FACILITATION PAYMENTS ARE PROHIBITED

Some companies operating in this region treat small, informal "facilitation payments" to speed up routine customs processes as normal business practice. CORRIDEX does not. These payments are bribes and are strictly prohibited, regardless of how small or how customary they may seem locally.

3. Gifts and Hospitality

Modest, occasional gifts or hospitality that are customary, transparent, and proportionate (for example, a holiday gift basket of reasonable value, or a working lunch) are generally acceptable. The following rules apply:

1. Gifts or hospitality must never be offered or accepted in connection with a pending customs declaration, tender, contract award, or any active decision.
2. Cash or cash equivalents (vouchers, gift cards) must never be given or accepted under any circumstances.
3. Any gift or hospitality offered to or received from a government official, regardless of value, must be declared to management in advance or as soon as practicable.
4. When in doubt, decline the gift and inform your manager.

4. Political and Charitable Contributions

CORRIDEX does not make political contributions on behalf of the Company. Any charitable donation or community contribution must be made transparently, recorded in the Company's books, and never used as a disguised means of influencing a business or regulatory decision (see also the Community / Social Policy).

5. Third Parties and Subcontractors

CORRIDEX is responsible for the conduct of agents, customs intermediaries, and transport subcontractors acting on its behalf. Before engaging any third party who will interact with customs or government officials on the Company's behalf:

- Reasonable due diligence must be performed on the third party's reputation and past conduct.
- Contracts should include a clear anti-bribery clause and the right to terminate immediately upon evidence of corrupt conduct.
- Payments to third parties must be proportionate to the legitimate service provided and properly documented — unusually large fees, or fees routed through unrelated third parties, are a red flag.

6. Red Flags — When to Pause and Ask

WARNING SIGNS

A customs or border official requests payment "to make this go faster" outside the official tariff.

A subcontractor or agent suggests a "special arrangement" to clear a shipment without standard documentation.

A client asks CORRIDEX to under-declare value, misclassify goods, or "not worry about" certain paperwork.

An invoice from an agent or fixer is vague, inflated, or unsupported by documented services.

Pressure to complete a transaction unusually quickly, with normal verification steps skipped.

If you encounter any of these situations, do not proceed. Pause, document what was requested, and escalate immediately to management.

7. Reporting and Non-Retaliation

Employees must report any solicitation of a bribe, any suspicion of corrupt conduct by a colleague, subcontractor, or client, or any pressure to violate this Policy. Reports can be made directly to management, verbally or in writing, and may be made confidentially upon request.

CORRIDEX guarantees that no employee will face retaliation, demotion, or any adverse consequence for refusing to pay a bribe, for refusing an instruction that would violate this Policy, or for reporting a concern in good faith — even if that refusal results in a delay, a lost shipment deadline, or a difficult conversation with a client or official.

8. Consequences of Violation

Any employee found to have offered, paid, solicited, or accepted a bribe will face disciplinary action up to and including immediate termination, and the matter may be referred to the relevant authorities. Subcontractors or agents in breach will have their contracts terminated immediately. CORRIDEX will not protect or shield any individual who violates this Policy, regardless of seniority or the business relationship at stake.

9. Training and Acknowledgement

All employees will receive training on this Policy upon joining the Company and on a recurring basis thereafter. All employees must sign an acknowledgement confirming they have read, understood, and agree to comply with this Policy.

Acknowledged by:

Name: _____

Signature: _____

Date: