

ANTI-BRIBERY AND ANTI-CORRUPTION POLICY



Prime Expertise Limited

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Tanzania.

EFFECTIVE DATE	March 2022	DATE OF LAST REVISION	March 2023	VERSION NO.	1.0.2
APPLIES TO					
GROUP 1	Associates	GROUP 2	Employees	GROUP 3	Partners
GROUP 4	Interns	GROUP 5	—	GROUP 6	—

VERSION HISTORY				
VERSION	APPROVED BY	REVISION DATE	DESCRIPTION OF CHANGE	RESPONSIBILITY
1.0.1	Board of Directors	N/A	N/A	Managing Director
1.0.2	Board of Directors	March 2023	Annual review to address any gaps or inconsistencies	Managing Director

Purpose

Prime Expertise places high importance on upholding responsible and fair business practices and is committed to promoting and maintaining the highest level of ethical standards in relation to all of its business activities. We take a zero-tolerance approach to bribery and corruption, and we are committed to acting fairly and with integrity in all of our business dealings and relationships.

The purpose of this Policy is therefore to communicate our commitment to full compliance by the Company, our associates, employees, interns, and all third parties working with us, including consortium partners, with the main law governing anti-corruption in Tanzania, i.e., the Prevention and Combating of Corruption Act, 2007, and any other international anti-bribery and/or anti-corruption laws, rules, and regulations that may be applicable from time to time.

Scope

Prime Expertise's Anti-bribery and Anti-corruption Policy applies to all those who work for or on behalf of the Company across Tanzania, East Africa, and beyond, whether full time or part time, temporary or permanent, including our own associates, employees, interns, and all third parties such as consortium partners.

The term "Prime Expertise personnel or personnel" is used throughout this Policy to cover all associates, employees, and interns.

General guidelines

Prime Expertise is dedicated to ensuring full compliance by its personnel and all third parties with anti-bribery and/or anti-corruption laws, rules, and regulations, including the Prevention and Combating of Corruption Act, 2007.

Generally, anti-bribery and anti-corruption laws prohibit making payments or gifts to the Government officials or another person in a powerful position in order to secure any improper business advantage. Prime Expertise

understands the importance of eliminating bribery and corruption and the role that discouraging bribery and corruption plays in creating a safer, more stable political and business environment.

No Prime Expertise personnel may offer payments (or anything else of value) to a Government officer or potential client that will assist the Company or its clients in obtaining or retaining business or securing any improper business advantage. Every Prime Expertise personnel is obligated to keep books, records, and accounts that accurately and fairly reflect all transactions and the use of assets.

Prime Expertise takes bribery and corruption very seriously, and any personnel found to be violating this Policy will be subject to disciplinary action, which may include termination of contract or employment, amongst other things. Prime Expertise encourages personnel to report any violations or suspicious activity that is highlighted above. Failure to report known or suspected violations may result in disciplinary action.

Prime Expertise will be constantly revising its training and procedures for addressing bribery and corruption in order to keep its personnel and policies as effective as possible.

Amendments

Please note that this Policy is subject to change from time to time. Any changes to this Policy made in the future will be reflected on the Prime Expertise website.

Relevant legislation

The Prevention and Combating of Corruption Act, 2007, available at: <https://www.anti-moneylaundering.org/Document/Default.aspx?DocumentUid=8F8896E5-8973-41F0-ACCB-1EBBCA8E2A3D>.

Related policy

Code of Conduct, available at: <https://primeexpertise.co.tz/wp-content/uploads/2023/04/Code-of-Conduct.pdf>.