

ONEPORT LIMITED

Anti-Bribery and Anti-Corruption Policy

1. Purpose & Scope

- a. OnePort Limited is committed to upholding high standards of business integrity, honesty and transparency in all its business dealings.
- b. OnePort Limited strictly prohibits any form of bribery or corruption.
- c. This Policy applies to all directors, officers and employees in OnePort Limited (“Employees”), as well as its Third Party Representatives (as further described below).

2. Prohibition on Improper Payments, Kickbacks and Other Forms of Bribery Scope

- a. Bribery involves giving or offering to give any advantage, directly or indirectly, to a public servant (i.e. officers, members and employees of public bodies) or any employee of a company or other person connected with a business, as an inducement or reward for or otherwise on account of such person’s conduct in relation to their employer’s/principal’s affairs. It also involves soliciting or accepting bribes.
- b. Bribery usually occurs where a person offers advantages to another as an inducement or reward for the recipient’s improper performance of duties (usually to win or retain business or advantages), or where the recipient abuses his authority or position for personal gain. Bribery can also take place where the offer or payment is made by or through a third party.
- c. Bribes and kickbacks can consist of anything of value (i.e. an “advantage”), including:
 - i. gifts, excess entertainment and hospitality, and sponsored travel and accommodation;
 - ii. cash payments, whether by or to employees or business partners such as agents, introducers or consultants;
 - iii. other favours provided by or to public officials, suppliers or customers, such as engaging a company owned by a member of a public official or customer’s family;
 - iv. free use of a company’s services, facilities or property; and
 - v. loans, loan guarantees or other extensions of credit on preferential terms, or other intangible forms of preferential treatment.
- d. Employees are strictly prohibited (whether acting in their own capacity or on OnePort Limited’s behalf) from:
 - i. offering, promising, giving or authorizing, directly or indirectly, any bribe or kickback to or for the benefit of any person (whether

- in private or public office) in order to obtain any improper business or other improper advantage for OnePort Limited;
- ii. soliciting, accepting or receiving (whether for OnePort Limited's benefit, their own benefit or that of their family, friends, associates or acquaintances) any bribe or kickback from any person (whether in private or public office) in return for providing any improper business or other improper advantage in relation to Oneport Limited's business;
- iii. otherwise using illegal or improper means (including bribes, favours, blackmail, financial payments, inducements, secret commissioners or other rewards) to influence the actions of others; or
- iv. acting as an intermediary for a third party in the solicitation, acceptance, payment or offer of a bribe or kickback.
- e. As well as complying strictly with the provisions in this Policy, Employees must exercise common sense and judgment in assessing whether any arrangement could be perceived to be corrupt or otherwise inappropriate.

3. Political and Charitable Contributions and Sponsorships

- a. Employees must not use any funds or assets of OnePort Limited for contributions to any political party or candidate for public office. In addition, no Employee may make any political contribution as a representative of OnePort Limited or create the impression that he or she is acting as a representative of OnePort Limited.
- b. Charitable donations and sponsorships may in some circumstances constitute a disguised form of bribery. Therefore, such activities should be approved by CEO.

4. Gifts and Hospitality ("Business Courtesies")

- a. Business Courtesies must comply with the following principles:
 - i. they must be reasonable and not excessive;
 - ii. they must be of modest value, both in isolation and when considered in the context of other gifts and hospitality offered to the same recipient;
 - iii. they must be appropriate and consistent with reasonable business practice;
 - iv. they must be provided with the intent only to build or maintain a business relationship or offer normal courtesy, rather than to

influence the recipient's objectivity in making a specific business decision;

- v. they should never be offered for something in return; and
- vi. they must be permissible under all applicable laws, rules and regulations.

- b. Employees should use good judgment; "everyone else does it" is not sufficient justification. In determining whether a specific business courtesy lies within the bounds of acceptable business practice, Employees are encouraged to discuss the issue with their supervisor.

5. Procurement of Goods and Services

- a. OnePort Limited is committed to dealing with its customers and suppliers in a fair, honest and professional manner, while seeking best value for the business. Potential suppliers are treated on an equal basis and no unmerited favouritism is to be shown in the procurement of goods and services. OnePort Limited conducts its procurement practices in a fair and transparent manner and Employees must act with due care and diligence when evaluating prospective contractors and suppliers.
- b. OnePort Limited will not deal with contractors and suppliers and other potential business partners known to be paying bribes and/or engaging in corrupt activity. Appropriate levels of diligence are to be conducted by adequately skilled persons in the selection and renewal of new and existing contractors and suppliers and other business partners (such as a joint venture partner) commensurate with the bribery risk associated with a particular relationship.

6. Third Party Representatives

- a. OnePort Limited is committed to promoting anti-corruption practices amongst any third party representatives it engages ("Third Party Representatives"). Examples of Third Party Representatives could include advisers, agents, consultants, introducers and finders, and political lobbyists. The prohibitions in this Policy apply to Third Party Representatives engaged to represent OnePort Limited's interests, breach of which could result in termination of their engagement.

7. Books and Records

- a. Accurate records of all company transactions and business courtesies must be kept. All receipts and expenditures must be supported by documents that describe them accurately and properly. The falsification of any book, record or account is prohibited.

8. Reporting of Bribery and Suspicious Activity

- a. If an Employee becomes aware of any actual or suspected breach of this Policy, he must report such incidents in accordance with the reporting and escalation procedures established by OnePort Limited.
- b. Employees are actively encouraged to report any concerns regarding bribery and corruption. Complaints are to be treated confidentially to the extent possible, and Employees raising legitimate concerns in good faith are to be protected; retaliation of any kind against any Employee for making good faith reports about actual or suspected violation of this Policy will not be permitted.
- c. Employees must cooperate fully and openly with any investigation into alleged or suspected corrupt activity or breach of this Policy. Failure to cooperate or to provide truthful information may also lead to the Employee being subject to disciplinary action, up to and including dismissal.

Remarks: OnePort may make changes to the above terms whenever it deems necessary, without notice.

Last Update: 25th November 2013.