



**MAKUPA TRANSIT
SHADE LTD**

Anti-Corruption & Bribery Policy

This anti-corruption and bribery policy exists to act as a source of information and guidance for those working at Makupa Transit Shade Limited. It helps them recognise and deal with bribery and corruption issues as well as to understand their responsibilities.

This anti-corruption and bribery policy applies to all employees (whether temporary, fixed-term, or permanent), consultants, contractors, trainees, seconded staff, home workers, casual workers, agency staff, volunteers, interns, agents, sponsors, or any other person or persons associated with us (including third parties), or any of our subsidiaries their employees, no matter where they are located (within or outside of Kenya).

In the context of this policy, third-party refers to any individual or organisation our company meets and works with. It refers to actual and potential clients, customers, suppliers, distributors, business contacts, agents, advisers, and government and public bodies – this includes their advisors, representatives and officials.

Facilitation Payments

The company does not accept any form of facilitation payments of any nature.

Gifts and Hospitality

The company accepts normal and appropriate gestures of hospitality and goodwill (whether given to/received from third parties) so long as the giving or receiving of gifts meets the following requirements:

- It is not made with the intention of influencing the party to whom it is being given, to obtain or reward the retention of a business or a business advantage, or as an explicit or implicit exchange for favours or benefits.
- It is not made with the suggestion that a return favour is expected.
- It is in compliance with local law.
- It is given in the name of the company, not in an individual's name.
- It does not include cash or a cash equivalent (e.g. a voucher or gift certificate).
- It is appropriate for the circumstances (e.g. giving small gifts around Christmas or as a small thank you to a company for helping with a large project upon completion).
- It is of an appropriate type and value and given at an appropriate time, taking into account the reason for the gift.
- It is given and/or received openly, not secretly.
- It is not selectively given to a key, influential person, clearly with the intention of directly influencing them.

As good practice, gifts given and received should always be disclosed to the Management Representative. Gifts from suppliers should always be disclosed.

Employee Responsibilities

As an employee you must ensure that you read, understand, and comply with the information contained within this policy.

If you have reason to believe or suspect that an instance of bribery or corruption has occurred or will occur in the future that breaches this policy, you must notify the Management Representative.

If any employee breaches this policy, they will face disciplinary action and could face dismissal for gross misconduct. The company has the right to terminate a contractual relationship with an employee if they breach this policy.

You must tell your Management Representative as soon as possible if you are offered a bribe by anyone, if you are asked to make one, if you suspect that you may be bribed or asked to make a bribe in the near future, or if you have reason to believe that you are a victim of another corrupt activity.

24.11.2025

DATE

Twalib Hatayan

CHIEF EXECUTIVE OFFICER

SIGNATURE