

Anti-Corruption and Transparency Policy

1. Policy Objective

The objective of this Anti-Corruption and Transparency Policy is to establish clear guidelines to prevent corruption and promote transparency in all business operations. **Miten** is committed to conducting business ethically, transparently, and in compliance with all applicable anti-corruption laws, thereby fostering trust among stakeholders, clients, and the public.

2. Scope

This policy applies to all employees, contractors, suppliers, partners, and third parties engaged in business with **Miten** across sectors, including energy, renewable energy, hydropower, transmission infrastructure, agribusiness, food processing, warehousing, and cold storage. It encompasses all activities related to procurement, project execution, finance, and partnership engagements.

3. Core Principles

A. Zero Tolerance for Corruption

- 1. Prohibition of Bribery and Corruption**
 - Maintain a zero-tolerance stance on all forms of bribery and corruption, including giving or receiving any undue advantage to influence business decisions.
- 2. Adherence to Anti-Corruption Laws**
 - Comply with local and international anti-corruption laws, including the Foreign Corrupt Practices Act (FCPA), UK Bribery Act, and relevant regulations in all operating regions.

B. Transparency and Accountability

- 1. Transparency in Business Activities**
 - Conduct all business activities transparently, ensuring clear, accessible documentation of transactions and decision-making processes.
- 2. Accountability at All Levels**
 - Promote accountability at every level of the organization, with clear roles and responsibilities to prevent and report unethical practices.

C. Ethical Conduct and Integrity

- 1. High Ethical Standards**
 - Foster a culture of integrity and honesty in all business dealings, emphasizing compliance with ethical standards in interactions with clients, partners, suppliers, and regulators.

2. Whistleblower Protection

- Protect employees who report unethical practices, ensuring a safe environment for whistleblowers to disclose information without fear of retaliation.

4. Prohibited Practices

A. Bribery and Facilitation Payments

1. Direct and Indirect Bribery

- Prohibit offering, giving, or receiving any bribe, kickback, or other improper payments to influence business outcomes.

2. Facilitation Payments

- Ban facilitation payments, except where legal or necessary to ensure personal safety. Any such incidents must be reported and documented.

B. Gifts, Hospitality, and Entertainment

1. Restrictions on Gifts and Hospitality

- Limit the giving or receiving of gifts, hospitality, or entertainment, ensuring it is only offered within reasonable bounds, does not influence business decisions, and complies with local regulations.

2. Gift and Hospitality Approval Process

- Require employees to report and seek approval for gifts, hospitality, or entertainment over a specified value to prevent conflicts of interest.

C. Conflict of Interest

1. Avoiding Conflicts

- Require employees to disclose any personal or financial interests that could conflict with company business decisions.

2. Conflict of Interest Management

- Implement a clear process for identifying and managing potential conflicts of interest, ensuring transparency and accountability.

5. Due Diligence and Risk Assessment

A. Risk-based Due Diligence

1. Third-Party Due Diligence

- Conduct thorough due diligence on all third parties, including contractors, suppliers, and joint venture partners, to assess risk factors and ensure compliance with anti-corruption standards.

2. Risk Assessment for High-Risk Projects

- Perform enhanced due diligence for high-risk projects or regions, focusing on compliance with anti-corruption and transparency regulations.

B. Financial Risk Controls

1. Transaction Monitoring

- Implement robust transaction monitoring to detect suspicious financial transactions, including irregular payments, inflations, or unauthorized expenses.

2. Audit Trails and Documentation

- Ensure all financial transactions are accurately documented and retain clear audit trails to support transparency and accountability in financial dealings.

6. Reporting and Incident Management

A. Reporting Mechanisms

1. Secure Reporting Channels

- Provide secure and confidential channels for reporting suspected incidents of bribery, fraud, or corruption, including anonymous reporting options where legally permitted.

2. Whistleblower Protections

- Implement whistleblower protections to encourage employees and third parties to report unethical practices without fear of reprisal.

B. Investigation Procedures

1. Prompt Investigation

- Respond promptly to all reports of suspected corruption or unethical practices, conducting thorough investigations with an impartial and transparent approach.

2. Disciplinary Actions and Remediation

- Take appropriate disciplinary action against individuals involved in corruption, including termination of employment, contract cancellation, and legal action where necessary.

7. Monitoring and Compliance Audits

A. Internal Audits

1. Regular Compliance Audits

- Conduct regular internal audits to assess compliance with anti-corruption and transparency policies, addressing any identified gaps or risks.

2. Audit Reporting and Remediation Plans

- Document audit findings and develop remediation plans to address areas of non-compliance, ensuring continuous improvement in ethical standards.

B. Third-Party Audits

1. **Third-Party Compliance Monitoring**
 - Perform periodic audits of high-risk third parties to confirm adherence to anti-corruption standards, focusing on procurement, finance, and project management activities.
2. **Vendor and Supplier Audits**
 - Assess compliance of suppliers and vendors through regular audits, ensuring they meet Miten's ethical and anti-corruption requirements.

8. Training and Awareness

A. Mandatory Anti-Corruption Training

1. **Employee Training Programs**
 - Provide mandatory anti-corruption and transparency training for all employees, focusing on legal requirements, prohibited practices, and reporting procedures.
2. **Role-specific Training**
 - Offer additional training for employees in high-risk roles, such as procurement, finance, and project management, to reinforce understanding of anti-corruption policies.

B. Awareness Campaigns

1. **Regular Awareness Initiatives**
 - Conduct periodic awareness campaigns to reinforce the importance of ethical conduct, transparency, and compliance with anti-corruption standards.
2. **Updates on Anti-corruption Standards**
 - Communicate updates to anti-corruption policies and regulatory changes to ensure employees remain informed and compliant.

9. Governance and Accountability

A. Anti-Corruption Compliance Committee

1. **Committee Oversight**
 - Establish an Anti-Corruption Compliance Committee responsible for overseeing adherence to anti-corruption policies, conducting risk assessments, and providing guidance on complex issues.
2. **Escalation Protocols**
 - Define clear escalation protocols for corruption-related issues, ensuring that critical incidents are promptly reported to senior management and resolved.

B. Role of Management

1. **Leadership Accountability**

- Hold senior management accountable for enforcing anti-corruption standards and promoting a culture of transparency and ethical conduct.
- 2. **Regular Policy Reviews**
 - Conduct regular reviews of the Anti-Corruption and Transparency Policy to ensure it aligns with evolving regulatory requirements and industry best practices.

10. Policy Review and Continuous Improvement

A. Policy Review Cycle

1. **Annual Policy Review**
 - Review this Anti-Corruption and Transparency Policy annually to incorporate updates in anti-corruption laws, industry standards, and feedback from compliance audits.
2. **Continuous Improvement**
 - Implement lessons learned from investigations, audits, and industry developments to enhance the policy's effectiveness and support continuous improvement.

B. Benchmarking and Best Practices

1. **Industry Benchmarking**
 - Regularly benchmark Miten's anti-corruption practices against industry peers, adopting best practices to strengthen compliance efforts.
2. **Feedback Mechanisms**
 - Encourage feedback from employees, partners, and stakeholders to identify areas for improvement and ensure the policy remains practical and enforceable.

Contact Information

For inquiries about this Anti-Corruption and Transparency Policy or to report a concern, please contact:

- **Compliance and Ethics Department**
- **Email:** info@mitenenerji.com

“This Anti-Corruption and Transparency Policy reflects **Miten**'s commitment to conducting business with integrity, promoting transparency, and maintaining the highest standards of ethical behavior across all operations.”

Miten Energy

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