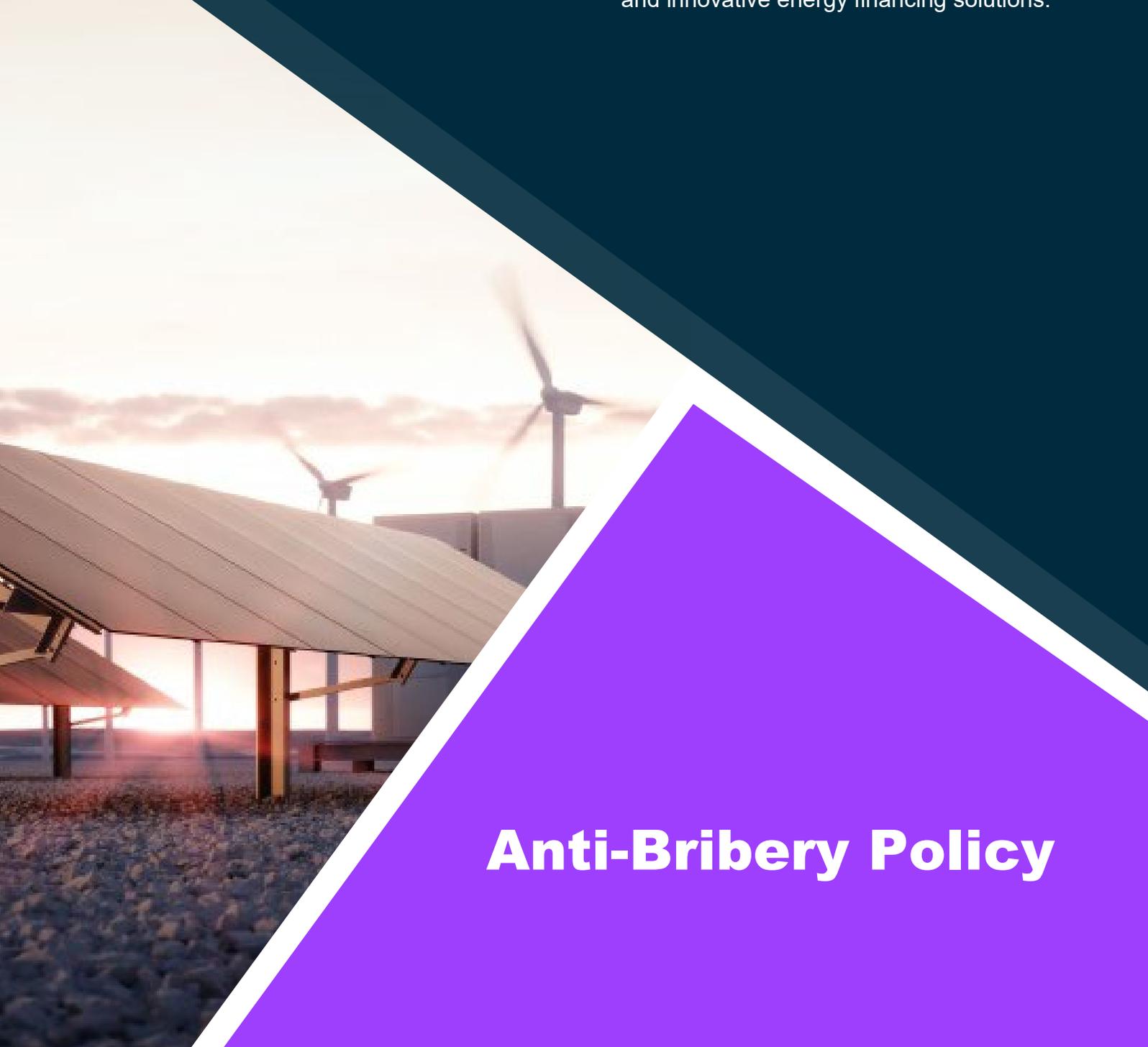


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**Anti-Bribery Policy**

# OUR ANTI-BRIBERY AND CORRUPTION POLICY

Last updated: December 16, 2024

## THE POLICY

This document sets out the long-standing policy of Sun4All Assetco Ltd (the “Company”) on combatting bribery and corruption. It was endorsed by the Board of Directors of the Company on December 16, 2024 and applies to all subsidiaries in the group.

The policy consists of two Principles and a series of Practical Procedures to give effect to those Principles. The objective of the Policy is to clearly set out the Company’s ‘Zero Tolerance’ approach bribery and corruption.

### The Principles

1. The Company will not pay & will not accept bribes, either directly or via third parties, in any circumstances. Breaches or attempted breaches of this principle by an employee will be regarded as an act of gross misconduct.
2. The Company will seek to encourage an equivalent policy in other business entities with which it has a significant business relationship.

### Practical Procedures

#### 1. Responsible Director

The Company will at all times nominate a Director to be responsible for overseeing the application of this anti-bribery and corruption policy and the Principles and Practical Procedures and for keeping a written risk assessment up to date. The Director will be sufficiently senior to be fairly regarded as independently minded.

#### 2. Training

Compulsory training will be provided to staff so that they are aware of this policy, relevant legislation and their obligations under the policy and their contract of employment.

#### 3. Senior Management Information

Senior management will be kept informed of the steps to implement the Principles and the Practical Procedures, of the conclusions of any reviews and of any material findings arising out of the work.

#### **4. Review**

The Company will monitor, review and at least annually report on the effectiveness of and adherence to its Principles, the Practical Procedures and the steps to implement them. The report will be submitted for approval by the Board of Directors.

#### **5. Internal Record Keeping**

The Company will ensure that records are maintained of such reviews and the consequent reports to its senior management.

#### **6. Communication**

The Company will communicate its Principles and Practical Procedures and its approach to their implementation to its employees and will publish this policy on its website and in its Employee Handbook. It will communicate its approach to their implementation to those that supply material goods & services to it both directly by correspondence but also by a clear statement on its website.

#### **7. Employee Conduct**

Employees are required to report any knowledge or suspicions of the offering, request for, receipt or payment of a bribe. A failure to do so may amount to gross misconduct.

No employee will suffer demotion, penalty or other adverse consequence for refusing to pay or accept a bribe even if such a refusal may result in The Company losing business or failing to win a deal.

#### **8. Whistleblowing**

The Company regards the reporting of any instance of bribery or attempted bribery as a legitimate example of 'whistleblowing' and affirms that no employee will suffer demotion, penalty, or other adverse consequences for reporting examples of or suspicions of the offer or request for or the receipt or payment of bribes.

#### **9. Gifts Register**

The Company will continue to keep records of the gifts and corporate hospitality given and received by its staff. These records will be reviewed regularly.

#### **10. Contractors and Associates**

The Company requires screening procedures to be carried out on those of its agents, advisers, contractors, intermediaries, and other representatives who supply material goods and services to it ("Associates") to protect The Company from the risk of it being associated with illegal or corrupt payments (or of payments purportedly being made on its behalf) and to ensure that the highest ethical standards are maintained.

The Company requires that Associates are made aware of its Anti-Bribery Principles and Practical Procedures; to confirm that they will not make or receive any payment that put it in breach of those Principles and that such Associates have adequate procedures for preventing their own staff engaging in the receipt or payment of bribes, kickbacks etc.

## 11. Reporting

The report and accounts of The Company and the Agenda for the Annual General Meeting will include a report on the workings and effectiveness of this policy including the number of reports of bribery and corruption received and a short summary of any investigations into them.

### **“Bribery and Corruption – our public statement**

The Company is committed to complying with all applicable laws and best corporate governance practices, wherever we operate. It is a core aspect of our mission to act with integrity in all of our operations. The Board of Directors of the Company expects all employees to comply with both the letter and spirit of the law and governance codes.

The Company affirms that will not pay or procure the payment of a bribe or unlawful fee to encourage the proper performance of a task or one which is intended or likely to compromise the integrity of another. We will not accept any payment, gift or inducement from a third party which is intended to compromise our own integrity.

The Company has communicated this policy to all its employees, to ensure that its commitment to integrity and legal compliance is followed.

When contracting with a third party we will insist that they acknowledge our commitment to good governance and that they in turn require the same high standards of those they engage.

Any person who believes that The Company or its staff are involved in bribery and corruption is encouraged to report their concerns to [info@sun4-all.com](mailto:info@sun4-all.com)

AS

# SUN4ALL

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