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Anti-Corruption and Anti-Fraud Policy

Submitted by:

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PACRA Registration Number: 120220026085

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Lusaka, Zambia

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1. Introduction and Purpose

Corelink Consulting Limited ("Corelink" or "the Company") is fundamentally committed to conducting its business with the highest level of integrity, transparency, and ethical standards. Corruption and fraud are illegal, damaging to our reputation, and contrary to our core values.

The purpose of this policy is to:

- Set out our unwavering position against all forms of bribery, corruption, and fraud.
- Provide clear guidelines and principles to all personnel on how to recognize and deal with these issues.
- Ensure that Corelink complies with all applicable anti-corruption and anti-fraud laws in every jurisdiction where we operate, including the Zambian Anti-Corruption Act and international standards like the UK Bribery Act and the U.S. Foreign Corrupt Practices Act (FCPA).

This policy is a cornerstone of our corporate governance and risk management framework. Adherence to it is not optional; it is a condition of employment and engagement with Corelink.

2. Scope

This policy applies to **all individuals working for or on behalf of Corelink**, in any capacity and in any location. This includes, but is not limited to:

- All full-time and part-time employees.
- Members of the Board of Directors.
- Contractors, consultants, and seconded staff.
- Agents, intermediaries, and any other third party representing the Company.

3. Policy Statement

Corelink Consulting Limited has a **zero-tolerance** policy towards bribery, corruption, and fraud. We will not engage in, tolerate, or condone any such activities in our business dealings. We are committed to acting professionally, fairly, and with integrity in all our relationships and transactions.

4. Key Definitions

To ensure clarity, the following key terms are defined:

- **Bribery:** The act of offering, promising, giving, demanding, or accepting any item of value (a financial or other advantage) to induce or reward a person for performing their function or activity improperly. It does not matter whether the bribe is given or received directly or through a third party.
- **Corruption:** The abuse of entrusted power for private gain. This is a broad term that includes bribery, extortion, fraud, and embezzlement.
- **Fraud:** Any intentional act of deception or dishonesty to secure an unfair or unlawful gain, or to deprive a victim of a legal right. Examples include false accounting, submitting fictitious expense claims, and theft of company assets.
- **Third Party:** Any individual or organization that you come into contact with during the course of your work for us. This includes actual and potential clients, suppliers, distributors, business contacts, agents, advisors, and government and public bodies.
- **Facilitation Payment:** A small, unofficial payment made to public officials to secure or expedite a routine or necessary government action (e.g., processing a visa or clearing goods through customs). **These are considered bribes under this policy and are strictly prohibited.**

5. Prohibited Actions

This section outlines specific activities that are strictly forbidden. Engaging in any of these actions will result in severe disciplinary measures.

5.1 Bribery and Improper Payments

You **must not** offer, promise, give, request, or accept a bribe in any form. This prohibition extends to making improper payments to anyone, including public officials and individuals in the private sector. You must never offer an "unofficial" payment to a government official to speed up a process or gain an advantage.

5.2 Gifts, Hospitality, and Entertainment

The giving and receiving of modest gifts and hospitality can be a legitimate way to build business relationships. However, they can also be perceived as bribes. The following rules **must** be followed:

- **Never Give or Accept:**
 - Gifts of cash or cash equivalents (e.g., gift cards, loans).
 - Any gift or hospitality that is offered with the expectation that something will be given in return (a *quid pro quo*).
 - Hospitality that is indecent, inappropriate, or could damage Corelink's reputation.
 - Any gift or hospitality during a competitive bidding or tender process.
- **Guidelines for Giving/Receiving:**
 - **Transparency:** All gifts and hospitality given or received must be transparent, properly recorded, and disclosed to your line manager.
 - **Reasonableness:** The value must be reasonable and proportionate to the nature of the business relationship. As a guideline, any gift or hospitality with a value exceeding **\$100 USD** (or local equivalent) requires pre-approval in writing from a Department Head.
 - **Recording:** All approved gifts and hospitality (given or received) above **\$50 USD** must be logged in the company's central Gifts and Hospitality Register, maintained by the Compliance Officer.

5.3 Political and Charitable Contributions

Corelink does not make contributions to political parties or candidates. Charitable donations must not be used as a disguise for bribery. Any charitable donation made on

behalf of the Company must be legal, ethical, and pre-approved in writing by the Board of Directors.

5.4 Dealings with Third Parties

Corelink can be held responsible for the actions of its agents and third-party representatives. Therefore, appropriate due diligence must be conducted on all third parties before engagement to ensure they share our commitment to anti-corruption. Any contracts with third parties must include anti-bribery clauses.

6. Employee Responsibilities

Every individual covered by this policy has a responsibility to:

- Read, understand, and comply with this policy in its entirety.
- Prevent, detect, and report any instances of bribery or corruption.
- Maintain accurate and transparent financial records and accounts.
- Raise concerns about any potential violations immediately through the proper channels. **"Turning a blind eye" is not an option and may be treated as a violation of this policy.**

7. Reporting Violations (Whistleblowing)

We encourage an environment of openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken.

If you suspect or discover any activity that you believe may be a violation of this policy, you **must** report it immediately. You can report your concerns through any of the following channels:

1. Your immediate Line Manager.
2. The Head of Human Resources.
3. The designated Compliance Officer.
4. Via a confidential email to a dedicated address: compliance@corelink.co.zm

Reports will be treated with the utmost confidentiality. **Corelink** strictly prohibits any form of retaliation against an individual who reports a concern **in good faith**. Any employee found to have retaliated against a whistleblower will face severe disciplinary action.

8. Actions and Consequences of Violation

Any violation of this policy will be treated with the utmost seriousness. Upon receiving a report of a potential violation, the Company will launch a prompt and thorough investigation.

An employee found to have violated this policy will face **immediate and severe disciplinary action**, which may include, but is not limited to:

- A formal written warning.
- Loss of bonus or other benefits.
- Demotion.
- **Immediate termination of employment or contract for gross misconduct.**

In addition to internal disciplinary action, Corelink reserves the right, and may be legally obligated, to:

- **Report the matter to the appropriate law enforcement authorities** (e.g., the Anti-Corruption Commission in Zambia, or other relevant national bodies).
- Seek to recover any losses incurred by the Company as a result of the violation.

Engaging in bribery, corruption, or fraud can lead to severe personal consequences, including **criminal** prosecution, significant fines, and **imprisonment**.

9. Training and Communication

Corelink will provide regular training on this policy to all employees to ensure they understand their responsibilities. This policy will be made available to all personnel on the company intranet and will be a part of the onboarding process for all new hires.

10. Policy Review

The Board of Directors and senior management are responsible for the regular review and updating of this policy, at least once every two years, to ensure it remains effective and compliant with all applicable laws.

Acknowledgement of Receipt and Understanding

I, the undersigned, hereby acknowledge that I have received, read, and fully understood the Corelink Consulting Limited Anti-Corruption and Anti-Fraud Policy. I agree to comply with all its terms and conditions as a condition of my continued employment/engagement with the Company. I understand that any violation of this policy may lead to disciplinary action, up to and including termination, and potential legal proceedings.

Signed by:

A handwritten signature in blue ink, appearing to read 'S Chishimba', written in a cursive style.

Susan Chishimba

Director, Corelink Consulting Ltd.

Date: 17th January 2025

A handwritten signature in black ink, appearing to read 'Rowan J. Vos', written in a cursive style.

Rowan J. Vos

Director, Corelink Consulting Ltd.

Date: 17th January 2025