

## Anti-Corruption Policy

### Introduction:

Black Reiver Consulting (hereinafter referred to as "the Company") is committed to conducting its business with integrity, honesty, and in compliance with all applicable laws and regulations. As part of this commitment, the Company has adopted this Anti-Corruption Policy to ensure that all employees, contractors, agents, and representatives adhere to the highest standards of ethical conduct and do not engage in any form of bribery or corruption in their interactions with clients, suppliers, government officials, or any other third parties.

### Policy Statement:

The Company prohibits all forms of bribery, corruption, and unethical conduct in its business activities, whether directly or indirectly, and expects all employees, contractors, agents, and representatives to comply with this policy at all times.

### Key Principles:

1. **Bribery and Corruption:** The Company prohibits offering, promising, giving, soliciting, or accepting any form of bribe, kickback, facilitation payment, or another improper advantage, whether in cash or in kind, to or from any person or entity, including government officials, in order to obtain or retain business or gain any other improper advantage.
2. **Gifts, Entertainment, and Hospitality:** While the Company recognises that the exchange of gifts, entertainment, and hospitality is a common business practice, employees, contractors, agents, and representatives must ensure that such exchanges are reasonable, proportionate, and not intended to influence business decisions or gain an unfair advantage improperly.
3. **Conflicts of Interest:** Employees, contractors, agents, and representatives must avoid conflicts of interest and must disclose any actual or potential conflicts of interest to the Company's management. They must not engage in any activities that could compromise their judgment or impartiality in carrying out their duties on behalf of the Company.
4. **Due Diligence:** The Company will conduct due diligence on third parties, including clients, suppliers, agents, and business partners, to assess their integrity and reputation before entering into any business relationship with them.
5. **Record-Keeping:** Accurate and transparent record-keeping is essential to prevent and detect bribery and corruption. Employees, contractors, agents, and representatives must maintain complete and accurate records of all business transactions and expenses in accordance with the Company's policies and procedures.

### Reporting and Compliance:

Employees, contractors, agents, and representatives who suspect or become aware of any violation of this policy must report it immediately to the Company's management or through the Company's confidential reporting channels. The Company will investigate all reports of alleged bribery or corruption promptly and take appropriate disciplinary action against those found to have violated this policy, up to and including termination of employment or contractual relationship.

#### Training and Awareness:

The Company will provide regular training and awareness programs to educate employees, contractors, agents, and representatives about their obligations under this policy and to promote a culture of integrity, transparency, and ethical conduct throughout the organisation.

#### Conclusion:

The Company is committed to maintaining the highest standards of ethical conduct and compliance with anti-corruption laws and regulations. By adhering to this policy, employees, contractors, agents, and representatives play a vital role in safeguarding the Company's reputation and upholding its commitment to integrity and transparency in all aspects of its business operations.

Date of Adoption: 03.05.2021

This policy becomes effective immediately upon adoption and applies to all Black Reiver Consulting employees, contractors, agents, and representatives.