



IDG Group DMCC

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ANTI-CORRUPTION POLICY

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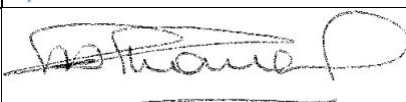
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ANTI-CORRUPTION POLICY

1. Introduction

IDG has zero tolerance of corruption.

This Policy addresses general anti-corruption issues and specifically addresses corruption in the recruiting, selection and vetting of our personnel. We rely on the quality of people to ensure security and the reputation and success of the Company. We also rely on current employees to help us find new personnel. Corruption in recruiting is endemic, and IDG will not tolerate it within the business.

Our Company ethos (or Kaida) is centered on honesty and integrity, which is also the Kaida of a true Gurkha. Following this Kaida enables us to provide the highest quality security solutions to meet clients' needs, whilst remaining committed to providing secure employment for professional and experienced former Gurkha servicemen. Corruption and nepotism are absolutely and completely unacceptable.

As a Company we refuse to pay or accept bribes of any kind. If you are corrupt or dishonest you will not be welcome in this Company and, when your corruption or dishonesty is discovered, we will terminate your services. If you maintain the honourable traditions of a true Gurkha, we hope to be able to give you a long and successful career in the Company.

IDG does not tolerate corruption in its sub-contractors or agents and requires all members of staff to ensure that corruption is not practiced, tolerated or allowed to occur in any IDG activities.

2. General

All business is to be conducted in accordance with IDG Code of Conduct Policy, the IDG Code of Business Ethics and Conduct, and the IDG Employee Handbook.

All recruitment is to be conducted in accordance with the IDG Recruitment Policy, and the related country Standard Operating Procedures (SOPs).

All staff (including personnel who are contracted as opposed to employed) must read and understand the IDG Code of Conduct Policy and accept and acknowledge the principles within this document through signing their contract of employment.

3. Requirements of the Policy

To mitigate the risks associated with using agents, subcontractors, subsidiaries, or suppliers, IDG's policy requires that we:

- Document a clear and demonstrable business need for any outside entity, with an explanation of

why we are using them. This must then be approved by the Country Manager for routine business, and the Chief Executive Officer for larger projects (this is down to the discretion of the Country Manager).

Please refer to the Subcontractor and Procurement Policy, and related country SOPs

- Document the case for proposed payments in each instance
- Carry out a comprehensive due diligence process to satisfy ourselves that the outside entity is acting lawfully and in compliance with the requirements for which they are being utilised
- Conduct a face-to-face interview with any prospective agent, where possible
- Obtain external due diligence report if there is any question of conflict of interest between internal staff conducting the diligence (for example may stand to achieve higher bonus if the deal is signed). This must be signed off by the Country Manager
- The Chief Executive Officer must then approve and endorse any recommendation
- If required, ensure that there is a signed contract (that must require the agent to adhere to this policy, the IDG Human Rights Policy and the IDG Code of Conduct, and allows IDG to make auditing and compliance checks) the term of which should be for not longer than two years before any work is undertaken by the agent on our behalf.
- Provide briefings and explanations, on appointment and at regular intervals during the term of the contract, on our policies. If required, they should be supplied with the IDG 'Company in a Box'
- Ensure absolute clarity on who payments are to be made to. These should be made to the person / company with who we contract and should not ordinarily be made in cash. No payments should be made to numbered accounts, or to third parties.
- The Country Manager, on behalf of the CEO, oversees all relationships with any external entity and will seek regular activity reports on how the agent is undertaking their contracted services from the relevant Project Manager.
- If there is a breach of the contract, IDG will suspend all payments to the external entity and terminate the contract
- Ensure provisions in the contract include an indemnity from the external entity for damages arising from any breach of contract by them, including recovery of all payments already paid under the terms of the contract
- Any arrangements with third parties whereby IDG agree to use that third party or a specific contractor to provide specific elements of the services to clients within a region are considered agency agreements for the above purposes and the same points must be followed.

4. What To Do

Any member of Staff who has concerns that this policy is not being complied with should raise the matter immediately. You are referred to the Whistleblowing Policy for further guidance.