

Anti-Bribery and Corruption Policy

1. Purpose

This Anti-Bribery and Corruption Policy (the "Policy") is designed to ensure that Assidium Registry Ltd (hereinafter referred to as "AR" or the "Company") conducts its business in an ethical and lawful manner. The Policy outlines our commitment to preventing bribery and corruption in all forms and provides guidelines for employees, officers, directors, and third parties acting on behalf of the company.

2. Scope

This Policy applies to all employees, officers, directors, and third parties acting on behalf of AR, regardless of their location. It covers all business activities, including interactions with government officials, private sector partners, and other third parties.

3. Policy Statement

AR has a zero-tolerance approach to bribery and corruption. We are committed to conducting business with integrity and in compliance with all applicable laws and regulations, including the Foreign Corrupt Practices Act (FCPA) and the UK Bribery Act.

4. Definitions

- **Bribery:** Offering, giving, receiving, or soliciting anything of value to influence the actions of an official or other person in a position of authority.
- **Corruption:** Abuse of entrusted power for private gain.
- **Government Official:** Any officer or employee of a government or any department, agency, or instrumentality thereof.

5. Examples of Prohibited Conduct

- **Bribery:** Employees and third parties acting on behalf of AR are prohibited from offering, giving, receiving, or soliciting bribes.
- **Facilitation Payments:** Small payments made to expedite routine government actions are prohibited.
- **Gifts and Hospitality:** Offering or accepting gifts or hospitality that could influence business decisions is prohibited.
- Charitable contributions and sponsorships.
- Covering or reimbursing an official's expenses;
- **Offers of employment** or other benefits to a family member or friend of a foreign official;

- **Political party** and candidate contributions;
- **In-kind contributions**, investment opportunities, stock options or positions in joint ventures,
- and favourable or steered subcontracts.

These payments should not be confused with reasonable and limited expenditures for gifts, business entertainment and other legitimate activities directly related to the conduct of Assidium Registry's business.

6. Responsibilities

- **Employees:** Must comply with this Policy and report any suspected violations.
- **Managers:** Responsible for ensuring their teams understand and comply with this Policy.
- **Compliance Officer:** Oversees the implementation of this Policy and conducts regular risk assessments.

7. Reporting and Investigation

Employees are encouraged to report any suspected bribery or corruption to their manager or the Compliance Officer. Reports can be made anonymously. All reports will be investigated promptly and thoroughly.

8. Red flags

Assidium Registry has detailed standards and procedures for the selection, appointment and monitoring of agents, consultants and other third parties. Due diligence includes appropriate reference and background checks, written contract provisions that confirm a business partner's responsibilities, and appropriate monitoring controls. The presence of red flags in a relationship or transaction requires greater scrutiny and implementation of safeguards to prevent and detect improper conduct. Appointment of an agent or other third party ordinarily requires prior approval by an appropriate senior manager, description of the nature and scope of services provided in a written contract, and appropriate contractual safeguards against potential violations of law or Assidium Registry Policy.

9. Training and Communication

This Policy will be communicated to all employees and third parties acting on behalf of the company.

10. Accurate Record-Keeping

All financial records must be accurate and transparent. Employees must maintain records of all transactions, including gifts and hospitality, in accordance with company procedures.

11. Consequences of Non-Compliance

Violations of this Policy may result in disciplinary action, including termination of employment. In addition, individuals may face legal consequences, including fines and imprisonment.

12. Review and Monitoring

This Policy will be reviewed annually and updated as necessary to ensure its effectiveness. The Compliance Officer will monitor compliance with this Policy and report to the Board of Directors.

12. Contact Information

For questions or concerns about this Policy, please contact the Compliance Officer at sarah@risk101.com