

Code of Conduct:

Financial Integrity

The Assidium Registry's books and records must accurately and fairly reflect all our transactions in accordance with our accounting practices and policies. All members of staff, including Directors, contribute to the process of recording operational results and/or maintaining records.

Accountability: As a company we are committed to ensure that we are financially responsible:

- We are fiscally responsible and we hold ourselves and our colleagues responsible for the outcomes of our choices, behaviours and actions.
- We take responsibility for all outcomes, be they positive and negative.

Integrity: We are committed to ensure that we are financially responsible:

- We are honest, fair and transparent with our colleagues, our partners and customers, and all who benefit from our work.

Business Records

The accuracy and completeness of our disclosures and business records is essential to making informed decisions and to ensure accountability to our customers, regulators and others. Staff must ensure that the information recorded is accurate, timely and complete, and maintained in a manner that is consistent with our internal controls, disclosure controls and our legal obligations.

Staff requirements:

- Create records that accurately reflect the truth of the underlying event or transaction, guided by the principles of transparency and truthfulness.
- Be clear in business communications.
- Watch out for records that are not clear and complete, or that obscure the true nature of any action.
- Watch out for undisclosed or unrecorded funds, assets or liabilities.
- Watch out for improper destruction of documents. Follow the Record Management policy in this Code.

Accounting Practices:

All payments and transactions must be properly authorised in accordance with Assidium Registry Limited operating procedures and Delegations of Authority, and fully and accurately recorded in Assidium Registry Limited's books and records.

All payments and transactions must follow all applicable laws, requirements of Assidium Registry Limited donors and funders and established accounting policies.

Assidium Registry Limited will not tolerate dishonesty, including false recordkeeping.

Staff requirements:

- Never issue incorrect, incomplete or inexact information, or information which could confuse the person who receives it.
- Never rationalise or even consider making false representations or falsifying records.
- If you are aware of or suspect false recordkeeping or representations by others, you must report such activities immediately.

Anti-Corruption and Bribery

All forms of bribery, kickbacks, and other corrupt practices are prohibited regardless of local customs. Assidium Registry Limited is committed to complying with all applicable anti-corruption laws.

Assidium Registry Limited does not pay bribes, kickbacks or facilitation payments at any time for any reason.

Assidium Registry Limited staff are not permitted to request, solicit, or accept cash or fund transfers from beneficiaries or partners for program activities.

Please read our document 'Anti Bribery and Corruption'

Third Parties Acting on Behalf of Assidium Registry Limited

We carefully screen all third parties, including suppliers, consultants, and vendors who work on Assidium Registry Limited's behalf, particularly when dealing in countries with high corruption rates.

Third parties must understand that they are required to operate in strict compliance with our standards and to maintain accurate records of all transactions.

Anti-Money Laundering/Anti-Terrorist Financing

Money laundering is defined as the process of converting illegal proceeds so that funds are made to appear legitimate, and it is not limited to cash transactions.

Involvement in such activities undermines Assidium Registry Limited's integrity, damages our reputation and can expose our organization and the individuals involved to severe sanctions. Assidium Registry Limited screens employees and its vendors and partners against this risk. All staff must immediately report any suspicious financial transactions and activities.

Antitrust and Fair Competition

Assidium Registry Limited believes in free and open competition and will not engage in improper practices that may limit competition. We never look to gain competitive advantages through unethical or illegal business practices.

The following activities must be avoided and, if detected, reported:

- Sharing Assidium Registry Limited's competitively sensitive information or that of our customers with a competitor
- Sharing competitively sensitive information of business partners or other third parties with their competitors
- Attempting to obtain non-public information about competitors from new hires or candidates for employment

- Collusion, including agreements or exchanges of information on supplier pricing, terms or wages.
- Bid-rigging—when competitors or service providers manipulate bidding so that fair competition is limited. This may include comparing bids, agreeing to refrain from bidding or knowingly submitting noncompetitive bids.

Global Trade

All employees, officers and directors must strictly comply with laws that govern our operations.

Supplier, Vendor, or Consultant Relations and Purchasing

Assidium Registry Limited evaluates and engages with qualified suppliers, vendors, and consultants or contractors on an objective basis, grounded in fairness. When selecting suppliers, we assess each supplier's ability to satisfy our organizational and technical needs and requirements and any local government's employment recommendations.

We make procurement and purchasing decisions based on the long-term cost and benefit to Assidium Registry Limited. All agreements are negotiated in good faith and must be fair and reasonable for both parties.

Glossary

Corruption is the abuse of an entrusted power for private gain.

Bribery means giving or receiving anything of value (or offering to do so) to obtain business or a financial or commercial advantage.

Kickbacks are payments made with the intent to influence or gain something from a company or person.

Facilitation payments are typically small payments to a low-level government official that are intended to encourage the official to perform his responsibilities.