

Anti-Corruption Policy Statement

Established in 2008 and incorporated in 2013 as a private limited company, GENPART SERVICES LTD. is a 100% local private limited company and is a leading generator services provider with an outstanding reputation for bespoke and innovative engineering, product outsourcing, service, and customer relations.

We take pride of serving major banks in Kenya, institutions and corporations of the Kenya Government, development agencies and non-governmental organizations including UN Agencies.

GENPART SERVICES LTD has a zero tolerance to corruption and is an advocate of professional ethic and morals that are based on principles taught in the Holy Scriptures.

Our motto is to focus all efforts to consistently deliver quality and service which exceeds the toughest demands and scheduling. We do this by employing tactical work process flow, business outsourcing models, ROIs and best practices.

From the beginning, our company has provided direct benefit to our clients through competitive pricing, scalable capabilities, and building quality partnerships. Through our widely recognizable strengths, GENPART SERVICES LTD maintains the technical expertise, professionalism, and financial capacity to succeed on the largest and deemed most mission-critical requirements.

Anti-Corruption and Bribery Policy

Policy statement

It is the policy of **Genpart Services Ltd** (the Firm) to conduct business in an honest and ethical manner. As part of that, the Firm takes a zero-tolerance approach to bribery and corruption and is committed to acting professionally, fairly and with integrity in all its business dealings and relationships, wherever it operates, and implementing and enforcing effective systems to counter bribery.

Purpose

The Firm will uphold all laws relevant to countering bribery and corruption in all the jurisdictions in which it conducts business, including, **Laws of Kenya. Anti-Corruption & Economic Crimes Act No.3 of 2003, Revised 2016 [2014]**, which applies to conduct both in the Kenya and abroad.

Scope and applicability

This policy applies to all individuals working for or on behalf of the Firm at all levels and grades, whether permanent, fixed-term or temporary, and wherever located, including consultants, contractors, seconded staff, casual staff, agency staff, volunteers, agents, sponsors and any other person who performs services for or on behalf of the Firm, (collectively referred to as Workers in this policy).

In this policy, Third Party means any individual or organization that Workers come into contact with during the course of work and the running of the Firm's business, and includes actual and potential clients, intermediaries, referrers of work, suppliers, distributors, business contacts, agents, advisers, government and public bodies (including their advisers, representatives and officials), politicians and political parties.

What is bribery?

A bribe is an inducement or reward offered, promised or provided in order to improperly gain any commercial, contractual, regulatory or personal advantage, which may constitute an offence under the Act, namely:

- giving or offering a bribe;
- receiving or requesting a bribe; or
- bribing a foreign public official.

The Firm may also be liable under the Act if it fails to prevent bribery by an associated person (including, but not limited to Workers) for the Firm's benefit.

Gifts and hospitality

This policy does not prohibit normal and appropriate gifts and hospitality (given and received) to or from Third Parties unless otherwise specifically stated. However, we have specific internal policies and procedures which provide guidance to Workers as to what is to be regarded as normal and appropriate gifts and hospitality in terms of financial limits, subject to the principles set out below (the Overriding Principles), namely that any gift or hospitality:

must not be made with the intention of improperly influencing a Third Party or Worker to obtain or retain business or a business advantage, or to reward the provision or retention of business or a business advantage, or in explicit or implicit exchange for favors or benefits;

must comply with local law in all relevant countries;

must be given in the name of the organization, not in an individual's name;

must not include cash or a cash equivalent;

must be appropriate in the circumstances;

must be of an appropriate type and value and given at an appropriate time taking into account the reason for the gift;

must be given openly, not secretly; and

in the case of gifts, they must not be offered to, or accepted from, government officials or representatives, politicians or political parties, without the prior approval of either the Firm's Anti-Bribery Compliance Officer employed by our Auditors.

The Firm appreciates that the practice of giving business gifts varies between countries and regions and what may be normal and acceptable in one region may not be in another. The test to be applied is whether in all the circumstances the gift or hospitality is reasonable and justifiable both in Kenya and any other relevant country. The intention behind the gift should always be considered.

What is not acceptable?

It is not acceptable for any Worker (or someone on their behalf) to:

give, promise to give, or offer, a payment, gift or hospitality with the expectation or hope that they or the Firm will improperly be given a business advantage, or as a reward for a business advantage already improperly given;

give, promise to give, or offer, a payment, gift or hospitality to a government official, agent or representative to facilitate or expedite a routine procedure;

accept payment from a Third Party where it is known or suspected that it is offered or given with the expectation that the Third Party will improperly obtain a business advantage;

accept a gift or hospitality from a Third Party where it is known or suspected that it is offered or provided with an expectation that a business advantage will be improperly provided by the Firm in return;

threaten or retaliate against another Worker who has refused to commit a bribery offence or who has raised concerns under this policy; or engage in any activity that might lead to a breach of this policy.

Facilitation payments and “kickbacks”

We do not make, and will not accept, facilitation payments or “kickbacks” of any kind, such as small, unofficial payments made to secure or expedite a routine government action by a government official, or payments made in return for a business favour or advantage.

Charitable Donations and Sponsorship

The Firm only makes charitable donations and provides sponsorship that are legal and ethical under local laws and practices and which are in accordance with the Firm’s internal policies and procedures.

Record keeping

We keep appropriate financial records and have appropriate internal controls in place which evidence the business reason for gifts, hospitality and payments made in line with company's Corporate Social Responsibility (CSR).

Responsibilities and raising concerns

The prevention, detection and reporting of bribery and other forms of corruption are the responsibility of all those working for us or under our control. All Workers are required to avoid any activity that might lead to, or suggest, a breach of this policy

Workers are required to notify the Firm as soon as possible if it is believed or suspected that a conflict with this policy has occurred, or may occur in the future, or if they are offered a bribe, are asked to make one, suspect that this may happen in the future, or believe that they are a victim of another form of unlawful activity.

Any employee who breaches this policy may face disciplinary action, which could result in dismissal for gross misconduct. We reserve our right to terminate our contractual relationship with non-employee Workers if they breach this policy.

If any Third Party is aware of any activity by any Worker which might lead to, or suggest, a breach of this policy, they should raise their concerns with the Firm's Anti-Bribery Compliance Partner, **Daven David & Associates, Certified Public Accountants (K), Astrol Petrol Station, Opposite Garden City, Thika Road, Nairobi**

Training and communication

Training on this policy is provided for all Workers and our zero-tolerance approach to bribery and corruption will, where appropriate, be communicated to clients, suppliers, contractors and business partners.

Monitoring and review

The Firm monitors the effectiveness and reviews the implementation of this policy at appropriate intervals, considering its suitability, adequacy and effectiveness. Any improvements identified are made as soon as possible. Internal control systems and procedures are also subject to regular review to provide assurance that they are effective in countering any risks of bribery and corruption.

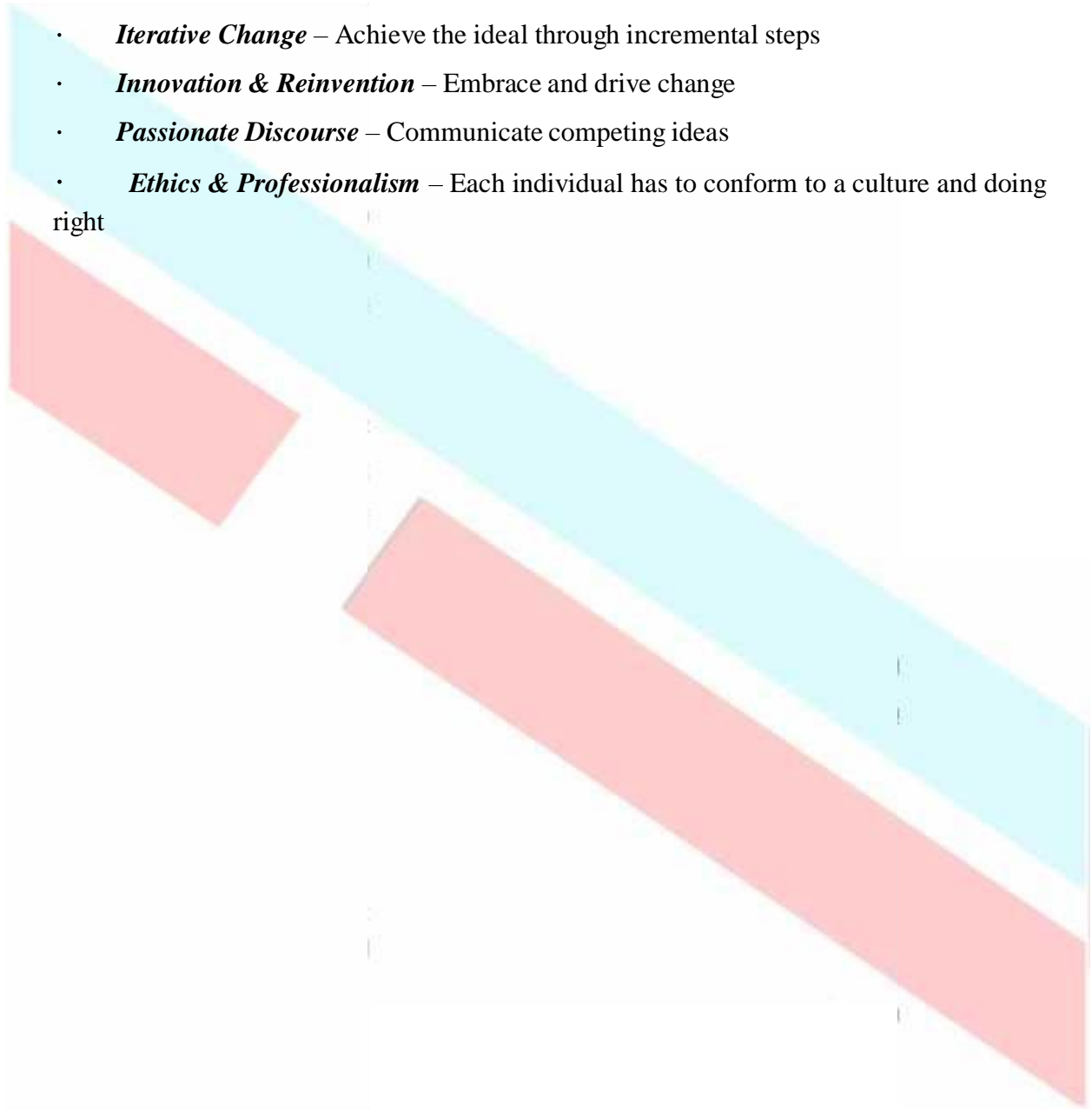
All Workers are aware that they are responsible for the success of this policy and should ensure they use it to disclose any suspected danger or wrongdoing.

Our Core Values:

Our Core Values are the essence of our identity and we appreciate each and every employee for their exemplification of these values.

- ***Commitment to Excellence*** – Perform at the highest level by exemplifying individual ownership
- ***Me in Team*** – Expect merit-based responsibilities and compensation
- ***Entrepreneurial Contributions*** – Impact the firm outside of our primary responsibilities

- ***Intellectual Curiosity*** – Grow through learning and educating
- ***Iterative Change*** – Achieve the ideal through incremental steps
- ***Innovation & Reinvention*** – Embrace and drive change
- ***Passionate Discourse*** – Communicate competing ideas
- ***Ethics & Professionalism*** – Each individual has to conform to a culture and doing right



COMMITMENT TO QUALITY

It is our policy to understand and meet the requirements of our customers, be they internal or external, and to ‘DO IT RIGHT THE FIRST TIME”, every time. Our aim is to consistently satisfy changing customers’ needs with absolute honesty and integrity.

This policy, therefore is vital to the achievement of the following overall objectives: -

- ☐ Employ suitable and winning models of WORK PROCESS & FLOW
- ☐ To constantly improve our Quality Management System through INTERNAL AUDITS and REVIEW MEETINGS.
- ☐ Reduction of unnecessary wastage and costs. Through CORRECTIVE AND PREVENTATIVE Actions and WARRANTY CLAIM REPORTS.
- ☐ Consistently monitoring customer requirements and satisfaction via known channels & processes-SATISFACTION QUESTIONNAIRE, AND FEEDBACK inputs.
- ☐ Provide TRAINING and continuously determine COMPETENCY levels of personnel performing work affecting the end product Quality.
- ☐ Continuously improve INFRASTRUCTURES and procedures in order to consistently increase the quality of our service and our products.
- ☐ To recognize and meet our legal responsibilities.

The above objectives are monitored through regular reviews and feedback to ourselves and our management of the effectiveness of the quality management system.