



AKC

SOLUTIONS

THE FOREIGN CORRUPT PRACTICES ACT (FCPA) POLICY

AKC International Solutions LTD

Abstract

A policy addressing compliance with anti-corruption and anti-bribery laws, including the US Foreign Corrupt Practices Act of 1977 (FCPA). It includes policies on combating corruption, prohibited and permitted payments, political and charitable contributions, and cash payments.



This policy is drafted allowing AKC International Solutions LTD to comply with our US based partners' and clients' requirements, AKC Solutions has other policies in place which are similar in essence for our EU and UK based partners

Global Business

Assessing Risks Where AKC International Solutions LTD identifies in its forecasted and new operations diligently. Based on outcomes, either mitigate those risks or decline the work. We accept clients based on good will, diligence and ethics.

Money Laundering

Money laundering is the concealment of the origins of illegally obtained money, typically by means of transfers involving foreign banks or legitimate businesses. AKC International Solutions LTD understands most of our clients will rarely be in a position to violate money laundering laws; however, both parties should be on the lookout for any suspicious payments and report them to the appropriate persons. AKC International Solutions LTD is open to transparently discuss origins of any funds it receive or send.

Fair and Open Competition

Competition or antitrust laws are commonplace in global business and ensure that every business transaction is open and transparent. AKC International Solutions LTD will not enter into any agreements that might restrict trade or even create the appearance that we have entered into any such agreement.

Government & Public Officials

AKC International Solutions LTD has respect for governmental authority and maintains honest and ethical relationships with its officials. All staff members and consultants must respect and obey the laws of country of their operations as well as the operations of our client. All information provided to government officials should be true and accurate and protective of the Company's legitimate business interests within the law and based on respecting our legal binding agreements with our clients.

In accordance with our zero-tolerance policy towards bribery and corruption, the giving of anything of value, directly or indirectly, to government officials or political candidates with a view to obtaining or retaining business or any other illegal payments is strictly prohibited. The company makes no contributions or donations or equivalent for political purposes.

Facilitation payments are small bribes paid to facilitate routine Government action. They are sometimes demanded and undermine corporate anti-bribery procedures such as this. The Government recognises the problems that commercial organisations face in some parts of the world and in certain sectors. If asked for a



“facilitation payment” or something of that nature, you should refuse to make any such payments, seeking justification for why the payments are necessary and commercially justifiable, pointing to AKC’s corporate position. Almost every country prohibits the bribery of its own officials.

Bribes (Federal Corrupt Practises Act – UK Anti Bribery Act 2010)

Each of these acts broadly describe bribery as the giving or offering of anything of value to government officials or others for the purpose of gaining or retaining a business advantage. AKC International Solutions LTD employees and anyone acting on its behalf are prohibited from directly or indirectly making, promising, authorizing, or offering anything of value to a government official or any other person on behalf of the Company to secure an improper advantage, obtain or retain business, or direct business to any other person or entity. This prohibition includes payments to third parties where the Company employee or person acting on behalf of the Company knows, or has reason to know, that the third-party will use any part of the payment for bribes. Any Company employee or person acting on behalf of the Company who suspects that this policy may have been violated must immediately notify the Business Ethics Officer. Any Company employee who, in good faith, reports suspected legal, ethical, or policy violations will not suffer any adverse consequence for doing so. When in doubt about the appropriateness of any conduct, the Company requires that you seek additional guidance before taking any action that may subject the Company to potential FCPA or UK Bribery Act liability.

Transparency in Financial Transaction

Full Audit Trails

All AKC International Solutions LTD employees are expected to cooperate fully with all internal and external audits. They must not give false or misleading information and should always endeavour to provide complete and accurate information. Employees should not destroy any record or document that may be used as part of an audit or investigation.

Accurate Accounting

The accuracy of AKC solutions LTD’s accounts requires all of its employees inputting any information including changes and amendments correctly. All employees are required to verify any financial information provided before submitting. Senior management should take responsibility to ensure that appropriate financial controls are always in place in all locations.



Gifts and Hospitality

We seek to outperform our competition fairly and honestly. We seek competitive advantages through superior performance, never through unethical or illegal business practices.

The purpose of business hospitality and gifts in a commercial setting is to create goodwill and sound working relationships, not to gain unfair advantage with customers.

General guide for gifts

- Gifts are consistent with customary business practices.
- Gifts are not excessive in value
- No cash or cash equivalent gifts
- The gift cannot be construed as a bribe or payoff
- The giving of a gift or hospitality does not violate any laws or regulations

No gift or entertainment should ever be offered, given, provided or accepted by any Company employee, director or officer, family member of an employee, director or officer, or agent unless it is for the right reasons. Gifts and hospitality can be given and received as long as they are in accordance with our Anti-Bribery and Corruption procedure which mandates. Any gift within reasonable value must be recorded and approved by a board member. **Any employee acts in a way against these policies will be terminated without notice. Possible legal prosecution might be triggered**

Ali Abdulla . Managing director on behalf of the board. London 2022

A handwritten signature in black ink, consisting of stylized initials 'A' and 'D' followed by a long horizontal line that ends in an arrowhead.