

Anti-Bribery and Anti-Corruption Policy Overview - Winich Farms Ltd

At Winich Farms Ltd, we maintain a zero-tolerance stance on bribery and corruption. This policy ensures that all company activities are conducted with integrity, professionalism, and fairness in compliance with the Economic and Financial Crimes Commission establishment Act 2004, the Independent Corrupt Practices and other related offences Act 2000, the Advance f Fee Fraud and other Fraud Offences related Act 2006, the Money laundering (prohibition) (Amendment) Act 2022, and other International conventions such as The African Union Anti-Corruption Convention 2003, U.S Foreign Corrupt Practices Act (FCPA) and the U.K Bribery Act 2010 (UKBA).

Key Policy Points:

- Fund Disbursement: All financial transactions follow strict internal procedures, including vetting and authorization.
- Prohibition of Bribery: Engaging in bribery, whether directly or indirectly, is strictly prohibited. This includes offering, giving, receiving, or soliciting anything of value to influence business outcomes.
- Facilitation Payments and Kickbacks: All forms of facilitation payments and kickbacks are banned, except in cases where an employee's safety is at risk.
- Gifts and Hospitality: Accepting or giving gifts, entertainment, or hospitality is only allowed if it is reasonable, modest, and aligned with the company's Code of Business Ethics.
- Employee Responsibilities: All employees must act ethically, avoid activities that could lead to bribery or corruption, and report any suspicious activities promptly.

Reporting and Compliance:

Employees are encouraged to report any concerns related to bribery or corruption through designated channels. Whistleblowers are protected against any form of retaliation for reporting in good faith.

Training and Monitoring:

Regular training is provided to ensure that all employees understand and comply with the policy. Winich Farms Ltd conducts regular audits and reviews to uphold its commitment to combating corruption.

Policy Review:

The policy is reviewed periodically to remain up-to-date with changes in applicable laws and regulations.

For more details, please contact our Compliance Team.