



Anti-Bribery Management Policy

Purpose

This policy affirms ACC's commitment to conducting business with the highest standards of integrity and in full compliance with applicable anti-bribery and anti-money laundering (AML) laws and regulations. It establishes guiding principles to prevent bribery, corruption, and the misuse of financial systems for illicit purposes.

Scope

This policy applies to all ACC employees, contractors, agents, suppliers, business partners, and third parties acting on behalf of the company, especially in Cisco-related engagements and high-risk transactions.

Policy Statement

ACC adopts a zero-tolerance approach to bribery and money laundering. Offering, soliciting, or accepting bribes or facilitating illicit financial activities is strictly prohibited. All business transactions must be transparent, lawful, and supported by accurate documentation.

Key Commitments

- No payments or benefits may be offered to gain improper advantage.
- All employees must report suspicious transactions or red flags.
- Due diligence must be conducted on third parties and financial transactions.
- Business records must reflect true and lawful transactions.
- Cash payments are restricted and monitored.
- Whistle-blower protection is ensured for good-faith reports.

Governance and Oversight

The Compliance Officer oversees implementation of this policy, supported by department heads and internal audit. Training is provided, and periodic reviews are conducted to ensure ongoing compliance.

Review and Monitoring

- This policy is reviewed annually and when triggering events occur (e.g., new country entry, new partnership, corruption incident).
- The Compliance Officer ensures ongoing monitoring and reports findings to the governance body.

Approved by: General Manager

Date: 20.05.2025

Anti-Corruption Code of Conduct Policy

Purpose

This Anti-Corruption Code of Conduct outlines ACC's commitment to ethical conduct and compliance with anti-corruption laws, including Cisco Partner Compliance requirements. It provides employees and business partners with clear expectations on how to identify, prevent, and respond to corruption risks across all areas of business activity.

Scope

This policy applies to all employees, officers, contractors, consultants, and any third parties acting on behalf of ACC, regardless of location or seniority.

Code of Conduct Principles

Prohibited Corrupt Behaviours

Employees must not:

- Offer or accept bribes or facilitation payments.
- Provide or accept gifts, hospitality, or favours that could influence business decisions.
- Use third parties to engage in corrupt practices on the company's behalf.

High-Risk Areas

Special care must be taken in the following areas:

- Interactions with public officials and regulatory bodies.
- Procurement, bidding, and contracting processes.
- Engaging with agents, intermediaries, or distributors.
- Making charitable or political donations.

Conflicts of Interest

Employees must:

- Disclose any personal, financial, or other interests that may conflict with company duties.
- Avoid decisions where impartiality could be compromised.
- Submit a Conflict of Interest Disclosure Form as required.

Reporting and Whistleblowing

Suspected violations must be reported to the Compliance Officer, via ethics@accwll.com, or through the anonymous whistle-blower email. No retaliation will be tolerated for good-faith reporting.

Enforcement and Disciplinary Action

Violations of this Code will result in disciplinary action, up to and including termination of employment or contract, and possible legal action.

Review and Acknowledgment

This Code of Conduct policy is reviewed annually and must be acknowledged by all personnel during onboarding and through periodic refresher training.

Approved by: General Manager

Date: 20.05.2025