

KBL INSURANCE LIMITED ZERO TOLERANCE APPROACH TO BRIBERY AND CORRUPTION

All KBL Insurance Limited's employees and third parties acting for and on behalf of KBL at every level of the organisation are expected to always do business in accordance with the values and behaviour of our Company.

KBL has a zero tolerance approach to bribery and corruption in all of our relationships and business dealings as part of our commitment to conduct business in an honest, prudent, and responsible manner.

KBL does not, and will not, accept and pay bribes or offer improper inducements or anything that could be perceived as such. KBL expects the same from its customers, business partners and third parties that perform services or deliver business on its behalf.

KBL Insurance Limited obligations include the following:

1. All forms of bribery and corruption, including facilitation payments, are strictly prohibited.
2. Gifts or entertainment must always be proportionate and reasonable; must have a legitimate purpose; and must not create a conflict of interest or the perception thereof. Cash or cash equivalents as part of gifts and entertainment are prohibited.
3. Employees and third parties may not make gifts or donations to political parties nor offer gifts or entertainment to candidates campaigning for political positions on behalf of KBL.
4. Paid and unpaid internships and secondments should only be offered based on merit.
5. Senior management is responsible for setting proper tone at the top, thereby fostering a culture in which bribery and corruption is not acceptable.

Public officials

Legitimate business interactions with public officials or state-owned entities are subject to enhanced attention and more rigorous rules such as pre-approvals and lower limits for gifts and/or entertainment.

Travel and accommodation

Travel and accommodation must not be offered or accepted as part of hospitality.

Charitable contributions

Charitable contributions must only be made to bona fide charities so they cannot be used to conceal a bribe.

Recording and registration

- All payments to third parties should be accurately recorded in KBL Insurance books and record and monitored.
- All gifts and entertainment must be accurately registered in hospitality register(s).

Speak up culture and reporting

KBL Insurance Limited employees and third parties acting for and on behalf of KBL are responsible for speaking up whenever they have identified any potential or actual breach and report it immediately to management or use the whistle-blower reporting channels.