

ANTI BRIBERY AND CORRUPTION POLICY

The Policy Purpose:

The purpose of this policy is to ensure that OPTSCS ("the Company") have appropriate systems and procedures in place to prevent corruption. This policy is designed to ensure that each division of the Company applies the right steps to comply with the Company's ethical standards and the local and international law. The Company has introduced this policy to enhancement its commitment to the Code of Business Conduct that has been established internally to ensure that appropriate ethical conduct is applied across OPTSCS's activities with a notice that Corruption means bribery, extortion, fraud, deception, collusion, cartels, abuse of power, trading in influence, money-laundering and other of similar activities.

Responsibilities:

- A. The board of Management Committee is responsible for designing, implementation and operation of the anti-corruption policy. The board shall ensure that management's members are aware of and accepts the policy.
- B. The Company has implemented a code of business conduct with an anti-corruption element and shall continue to implementing the code internally.
- C. The Company shall take steps to ensure that its financial controls must minimize the risk of any company's corrupt act against a business partner, individual or organization, or of any corrupt act being committed against the Company by a business partner, individual or organization.

Employment Practices:

The Company's employment practices shall ensure that:

- Employment contracts shall be modified to include contractual obligations and penalties in relation to corruption with specific reference to corruption description.
- Employees, particularly those in management positions or other posts where the corruption may be an issue, shall be scrutinized before they are employed to ascertain as far as is reasonable that they are the right of person who is likely to comply with the Company's anti- corruption policies.
- New employees shall be informed and instructed of the Company's Code of Business Conduct to ensure that they understand it and completely complying with it.
- Employees shall be required to declare any conflict of interest. Managers should monitor any potential of conflicts that may increase the risk of corruption.
- The Company to take appropriate disciplinary action against the employee who commits a corrupt act. These procedures should be specified in the employment contract.

Gifts:

The Company and each of its businesses shall implement a giveaway and hospitality policy which puts in place a sufficient guidance and procedures on the giving or acceptance gifts, hospitality, and donations.

Publication of the Code of Business Conduct:

At the outset of any business dealing, all new business partners should be made aware in writing of the Company's Code of Business Conduct.

Anti-Corruption Contract Terms:

All contracts between the Company and its business partners shall contain anti-corruption terms.

Detection Procedures:

The Company shall ensure that management and financial control procedures must check projects, contracts and systems on an arbitrary sample basis for any indication of corruption. Checks should cover financial, operational and technical aspects.

Reporting Procedures: The Company has in place internal procedures for reporting corruption in its "HOC" reporting system which enables employees to report corruption in a safe and confidential manner to a responsible senior officer of the Company. Each of its businesses shall ensure that the "HOC" reporting system is known to its employees. Managers are obliged to report corruption as soon as they become aware of it to the senior management of the Company.

Case records: The Company's businesses shall keep records of compliance matters.

Corruption Case Investigating: All investigations will be conducted in accordance with the Company's control incidents procedures.

Signed (on behalf of OPTSCS Director)



Date: September, 8th 2021