KEY INTEGRITY COMPLIANCE PROGRAMME POLICIES

Diyokes Consultants Limited (DCL) has prepared and implemented the firm's **Integrity Compliance Programme**. The programme is designed to help DCL prevent, detect, investigate, and remediate misconduct (the five primary sanctionable practices: **fraud, corruption, collusion, coercion, and obstruction)** in all our business operations.

Core Integrity Principles

The key DCL ICP policies include:

- **Prohibition of Misconduct:** A clearly written and visible commitment to zero tolerance for corruption, fraud, and collusion, which should be outlined in a formal Code of Conduct.
- **Management Role:** The Message from the Managing Director to all employees and business partners and Clients evidencing Tone from the top and management support to the ICP is presented in the next section. Compliance must be treated as mandatory for all staff at all levels.
- **Integrity Function:** Our integrity team will be made up of a group of senior staff including the MD, the Compliance Officer, a design Team Leader and a supervision team Project Manager at a minimum. They will manage, assess and supervise DCL's compliance with laws, regulations, MDBs' rules and regulations and our company ICP. We are not able at this moment to appoint an Ethics/Compliance Officer (CO) who will have primary responsibility for the implementation of our ICP. However, the MD will combine the duties of the CO pending when our staff disposition allows that.
- **Reporting Obligations: :** Establishment of secure channels for employees to report suspected misconduct without fear of retaliation. We encourage employees and third parties to make it a duty to report concerns of suspected misconduct, or conflict of interest, in any of our projects to his or her direct manager, or to the DCL ethics/compliance officer or to the managing director. A manager who suspects or receives a report of suspected misconduct, fraud or corruption or conflict of interest, has an obligation to report it to the DCL Managing Director (MD).
- **Whistle Blowing Channel:** Our reporting Channels include Directly to the employee's supervisor, to be forwarded onward to the integrity function; or directly to the CO or other integrity function personnel, or the DCL MD. Email addresses routed to the CO or integrity

function, such as “integrity@diyokes.com.” as well dedicated telephone line answered by the CO or other members of the integrity function and physical drop boxes in our Company offices, conference room, and other facilities that are checked regularly by the CO or members of the integrity function for any reports or questions about the ICP.

- **Investigation Protocols and Remediation Procedures:** We have protocols to investigate allegations of wrongdoing, discipline violators, and correct the internal systems that allowed the misconduct to happen.
- **Protocols for Conflict of Interest Reviews**: All our employees, managers and consultants have an obligation to conduct business within guidelines that prohibit actual or potential conflicts of interest, or even the appearance of a conflict of interest.

  An actual or potential conflict of interest occurs when an employee can influence a decision that may result in a personal gain for the employee or for a relative as a result of business dealings.
- **Specific Measures on Compliance with Procurement and Selection Procedures:** All employees and /or resident engineers engaged by DCL will sign a pre contract statement of commitment to and confirmation of availability on the Diyokes Consultants Limited design and supervision team for the proposed project. In addition, they will sign a pre contract statement of acknowledgement and commitment to DCL Integrity Compliance Programme (ICP).
- **Risk Assessment:** Periodic evaluations of the company’s specific business models and operations to identify areas vulnerable to misconduct.
- **Internal Controls:** Practical administrative, financial, and operational checks to reduce the likelihood of fraud or bribery occurring in our businesses including due diligence for business partners; financial processes; audits; gifts, entertainment, and hospitality; political and charitable donations, and sponsorships; facilitation payments; business development; measures to govern contract performance; incentives; disciplinary mechanisms; and record keeping.
- **Training and Communication:** Two-way engagement where we clearly communicate our ICP compliance policies to staff, conduct routine training, and listen to employee feedback to foster a culture of integrity.