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Document Control Information

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Reviewed by	Directors
Approved by	Founder and CEO, Alpha Data
Issued by	Human Resources Team

Scheme Ownership and Review Frequency

S.No	Ownership	Review Frequency	Last Reviewed	Remarks
1.	HR Specialist Alpha Data	Business Dependent	Jan 2018	First edition
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Objective

Alpha Data is committed to the prevention, deterrence and detection of fraud, bribery and all other corrupt business practices. It is Alpha Data's policy to conduct all of its business activities with honesty, integrity and the highest possible ethical standards and vigorously enforce its business practice, in all of its operations, of not engaging in bribery or corruption.

Scope and applicability

This Anti-Bribery and Anti-Corruption Policy applies to all individuals worldwide working for all affiliates and subsidiaries of Alpha Data at all levels and grades, including directors, senior executives, officers, employees (whether permanent, fixed-term or temporary), consultants, contractors, trainees, seconded staff, casual workers, volunteers, interns, agents, or any other person associated with Alpha Data.

In this Policy, "Third Party(ies)" means any individual or organization, who / which come into contact with Alpha Data or transact with Alpha Data and also includes actual and potential clients, suppliers, business contacts, consultants, intermediaries, representatives, subcontractors, agents, advisers,

joint ventures and government & public bodies (including their advisers, representatives and officials, politicians and political parties).

Definition

Corruption is the misuse of public power for private profit, or the misuse of entrusted power for private gain. Bribery is the offer, promise, or payment of cash, gifts, or even excessive entertainment, or an inducement of any kind offered or given to a person in a position of trust to influence that person's views or conduct or to obtain an improper advantage. Bribery and corruption can take many forms, including the provision or acceptance of:

- Cash payments;
- Phony jobs or “consulting” relationships;
- Kickbacks;
- Political contributions;
- Charitable contributions;
- Social benefits; or
- Gifts, travel, hospitality, and reimbursement of expenses.

Policy requirements

Alpha Data employees and agents are strictly prohibited from offering, paying, promising, or authorizing:

- any payment or other thing of value;
- to any person;
- directly or indirectly through or to a third party;
- for the purpose of (i.e., in exchange for);
- causing the person to act or fail to act in violation of a legal duty;
- causing the person to abuse or misuse their position; or
- securing an improper advantage, contract or concession;
- for Alpha Data or any other party.

(“Improper Payment Activity”)

To promote compliance with anti-corruption laws in UAE and other applicable jurisdictions, no Alpha Data employee shall undertake any Improper Payment Activity in respect of a foreign official, a domestic official, or a person doing business in the private sector.

In addition, Alpha Data's books and records must correctly record both the amount and a written description of any transaction. Alpha Data employee must ensure that there is a reasonable relationship between the substance of a transaction and how it is described in the Company's books and records.

It is contemplated that Alpha Data will institute detailed procedures and standards related to training, due diligence, the recording of transactions, and other areas, to implement the terms of this Policy. In particular, Alpha Data will institute standards and procedures for:

- Sponsoring travel of government or government officials;
- Direct and in-kind support for government or government officials;
- Security support for public law enforcement;
- Per diems for government officials;
- Agreements with government-affiliated third parties, including those who may interact with the government on Alpha Data's behalf or benefit;
- Contracting with state-owned entities;
- Meals, gifts, and entertainment for government officials;
- Charitable and cultural donations to government or government officials, or to those parties affiliated with them; and
- Political contributions.

Audits

Audits of Alpha Data offices, operating units, and contractors may be conducted periodically to ensure that the requirements of this Policy and applicable procedures and guidelines are being met. Audits may be conducted internally by Alpha Data, or externally by retained third parties. Audit documentation shall include performance improvement action plans.

Correlation with other Corporate Policies

Other Alpha Data policies impacted by, and which should be construed consistent with this Policy, include the Code of Conduct with Escalation Procedure, Standard of Business Conduct, Procedures for Implementing the Anti-Bribery and Anti-Corruption Policy, the Vendor On-Boarding Standard and the Supplier Code of Ethics.

Waiver

There is no permitted deviation or waiver from this Policy.

Discipline

Any employee who violates the terms of this Policy will be subject to disciplinary action. Any employee who has direct knowledge of potential violations of this Policy but fails to report such potential violations to Company management will be subject to disciplinary action. Any employee who misleads or hinders investigators inquiring into potential violations of this Policy will be subject to disciplinary action. In all cases, disciplinary action may include termination of employment. Any third party agent who violates the terms of this Policy, who knows of and fails to report to Alpha Data management potential violations of this Policy, or who misleads investigators making inquiries into potential violations of this Policy, may have their contracts re-evaluated or terminated.

Amendment Options

- Exceptions to the defined guideline shall be approved by Directors followed by CEO's approval.

Disclaimer

Company's Right to Alter or Abolish the Guideline

- Alpha Data reserves the right in its discretion to review or to alter the terms and conditions of this Guideline.

Confidentiality

Company is the Owner of this Document

- Alpha Data is the owner of this document and reserves the right to its confidentiality. It strictly cannot be shared in print or in mail with any Non Alpha Data Employee.