

BRIBERY/WHISTLEBLOWING POLICY

Bribery and Corruption Prevention

1. Prohibition of Bribery:

CESEL prohibits the offering, giving, solicitation, or acceptance of bribes, kickbacks, or other improper inducements, whether directly or indirectly.

This includes bribes to public officials, government representatives, business partners, or any other third parties.

2. Due Diligence:

Due diligence will be conducted on business partners, suppliers, and other third parties to assess their integrity, reputation, and compliance with anti-corruption standards.

Contracts with third parties will include anti-corruption clauses and provisions requiring compliance with applicable laws and regulations.

3. Political Contributions and Donations:

Political contributions and donations must be made transparently and in compliance with applicable laws and regulations.

Contributions to political parties, candidates, or campaigns will not be made if they could be perceived as attempts to influence government decisions or gain improper advantages.

Whistleblowing and Reporting Mechanisms

1. Whistleblowing Policy:

CESEL encourages employees and stakeholders to report any suspected fraud, corruption, bribery, or other unethical behavior through designated whistleblowing channels.

Whistleblowers will be protected from retaliation, harassment, or victimization for reporting concerns in good faith.

2. Confidential Reporting:

Confidential reporting mechanisms, such as hotlines, email, or anonymous reporting systems, will be established to facilitate the reporting of concerns.

Reports will be handled promptly, impartially, and confidentially, with appropriate investigations conducted as necessary.

3. Non-Retaliation:

CESEL prohibits retaliation against whistleblowers who report concerns in good faith.

Employees found to have engaged in retaliation against whistleblowers will be subject to disciplinary action.

Training and Awareness

1. **Employee Training:**

All employees will receive training on anti-fraud, anti-corruption, and bribery policies and procedures.

Training will raise awareness of the risks associated with fraud and corruption, and provide guidance on ethical decision-making and reporting procedures.

Compliance and Review

1. **Compliance Monitoring:**

Compliance with this policy will be monitored regularly through internal audits, reviews, and assessments.

Non-compliance issues will be investigated promptly, and appropriate corrective actions will be taken.

2. **Policy Review:**

This policy will be reviewed periodically to ensure its effectiveness, relevance, and compliance with evolving legal and regulatory requirements.

Updates and revisions will be made as necessary to strengthen anti-fraud, anti-corruption, and whistleblowing measures.

Dated: 10th of December 2023.



Dr. Patrick Tolani
CEO