



**South - Western Pacific International
Company Limited**

Anti-Corruption Policy

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South - Western Pacific International Limited Co. Ltd

Our Anti-Corruption Policy

Policy

Complying with Anti-Corruption and Anti-Bribery Laws / Requirements

This policy applies to

South - Western Pacific International Co. Ltd and all its subsidiaries and Joint Ventures where applicable with an interest of 50% or more and their directors, officers and employees.

Policy Objectives

- To ensure compliance by South - Western Pacific International Limited and its subsidiaries (where applicable) with applicable anticorruption law and anti-bribery laws as violation could subject the South - Western Pacific International Limited, its directors and employees to severe penalties, including fines and imprisonment, and could be very damaging to business and its reputation.

The Policy

It is the policy of the Board of South - Western Pacific International Limited that each director, officer and employee, will comply in all respects with all applicable domestic and international regulations, standards and principles relating to anti-corruption where we trade, operates or has any other activity. Each entity company where applicable, will establish and enforce effective compliance procedures. Any breaches of those procedures will be treated as serious disciplinary offences. No form of bribery, including improper offers or payments to or from employees, will be tolerated.



Contacts by or on behalf of the entity, with governments, government agencies or officials will be conducted in compliance with the Anti-Corruption Compliance Procedures & Guidelines and in a manner to ensure compliance with applicable anti-corruption laws in Ghana. Any consultants, advisors or other agent retained to assist or represent the entity with respect to governments, government agencies or officials will be informed of this policy and required to comply with its terms. Such agents will be retained only in accordance with the Anti-Corruption Compliance Procedures.

Governance & Responsibility

The responsibility for ensuring that each member complies with anti-corruption law rests with the management and Managing Director of South - Western Pacific International Limited Company Limited.

By & On Behalf of the Management of South - Western Pacific International Limited Company Limited.

July 2019.