

Anti-Bribery and Corruption Policy

Zarian Group considers bribery and corruption to include any payment of value, no matter how small or incidental, made to and/or received by any person with the intention and/or effect of improperly influencing their decision-making process and to gain a direct or indirect advantage for the company or the person making the payment. Acts of bribery and corruption are illegal in most areas in which the Zarian group operates. Whether or not legal under the national laws of the country in which the business activity takes place, or 'culturally accepted' these acts may be offences under laws with an international reach. Zarian group works from the assumption that any act of bribery or corruption is illegal, and takes a zero-tolerance approach to all forms of bribery and corruption. Acts of bribery and corruption go against the high moral and ethical standards with which the Zarian Group conducts its business.

The Counterparty is required to comply with this Policy in full, but to summarize some key requirements:

1. Zarian Group will not enter into legal relationships with Counterparty without there being a written document in place; no payments to Counterparty will be made unless such a contract governs the relationship.
2. We have a zero-tolerance policy to bribery and corruption in relation to all of our business activities. Payments by Counterparty that constitute a bribe will be considered a breach of contract.
3. Any breach of this policy could cause serious financial and reputational damage to the Zarian Group. Therefore, any breach of this policy will be a material breach entitling the relevant Zarian Group to terminate Counterparty contracts with immediate effect.
4. Any breach of this policy could also result in criminal proceedings against both the individual, the Counterparty in any jurisdiction.
5. We may investigate specific risks that dealing with any counterparty poses and carry out due diligence on all new and existing counterparty, proportionate to the perceived level of risk of corruption, at any point
6. Zarian Group staff are prohibited from receiving facilitation payments and any gift or hospitality which is given by a Counterparty in the expectation of favorable treatment or consideration by the recipient/donor must be declined.
7. Any gift, hospitality or sponsored travel offered by counterparty must be proportionate and reasonable in all circumstances in accordance with local customs, and must not exceed the financial limits stated in the policy.

Prince Haik Georg Eghiazarian
Chairman
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