



SPARTAN RELIEF SUPPLIES LTD

P.O. BOX 13912,
POSTCODE - 00800
NAIROBI, KENYA

TEL: (254) 020 2684995
CELL: (254) 0726 322 565 / 0734 322 565 / 6
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EMAIL: sales@spartanrelief.com, info@spartanrelief.com
WEBSITE: www.spartanrelief.com

ANTI-CORRUPTION AND WHISTLEBLOWING POLICY

ANTI-CORRUPTION POLICY

Spartan Relief Supplies Limited's (the Company or Spartan Relief) reputation depends on how we conduct business. All employees, business partners and agents of our company must comply with all applicable laws and regulations in any location in which we transact business.

We want our business partners, agents and employees to know that we conduct our business in an ethical manner. If a non-ethical practice is acceptable in a country does not mean it is acceptable to the Company.

Non-compliance with this policy can have very serious consequences for the Company. Compliance with this policy and governing documents issued by Management is mandatory.

If you suspect that the Company does not comply with this policy or applicable laws in your country, you must alert your manager or follow our Whistleblower policy.

Policy

All Spartan Relief personnel are to conduct company business in a legal and ethical manner. Spartan Relief must not use illegal payments, bribes, kick-backs or other questionable inducements to influence any business transaction. In addition, Spartan Relief employees must not directly or indirectly request, agree to receive or accept money or anything else of value, from any person or entity where it is designed to influence an action or to obtain an improper advantage. Spartan Relief Supplies Limited has a policy of zero tolerance of corruption.

Spartan Relief must always follow both Kenyan legislation as well as local legislation where the Company is operating. If there is a discrepancy the stricter legislation must be followed. This policy applies to all of the company's operations.

Compliance

It is the responsibility of Spartan Relief Supplies Limited's personnel, agents, distributors, or other representatives to at all times abide by all laws, regulations and international conventions applicable in the countries in which the Company operates or with which the Company's personnel, agents, distributors, or other representatives may otherwise come into contact. Lack of knowledge about applicable rules and regulations is never an excuse. It is never in the interest of the Company to violate this policy. Compliance with this policy is mandatory and failure to comply will be a disciplinary offence.



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WHISTLEBLOWING POLICY

1. POLICY STATEMENT

Spartan Relief Supplies Limited is committed to conducting its business in an honest, ethical and transparent manner. A culture of openness and accountability is essential to prevent such situations occurring and to address them in the correct manner when they do occur.

The aims of this policy are:

- To encourage staff to report suspected wrongdoing as soon as possible, in the knowledge that their concerns will be taken seriously and investigated appropriately with their confidentiality respected at all times
- To provide all employees with guidance as to how to raise those concerns
- To reassure all employees that they should be able to raise genuine concerns in good faith without fear of reprisals, even if they turn out to be mistaken

2. WHO IS COVERED BY THE POLICY?

All individuals working at all levels of the organisation, including senior managers, officers, directors, employees, consultants, contractors, trainees, homeworkers, part-time and fixed-term workers, casual and agency staff (collectively referred to as employees in this policy).

3. WHAT IS WHISTLEBLOWING?

Whistleblowing is the disclosure of information which relates to suspected wrongdoing or dangers at work. This may include:

- Criminal activity
- Miscarriages of justice
- Danger to health and safety
- Damage to the environment
- Failure to comply with any legal or professional obligation or regulatory requirements
- Bribery
- Financial fraud or mismanagement
- Negligence
- Breach of our internal policies and procedures
- Conduct likely to damage the Company's reputation
- Deliberate concealment of any of the above matters

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A whistle-blower is a person who raises a genuine concern in good faith relating to any of the above. If you have any genuine concerns related to suspected wrongdoing or danger affecting any of the Company's activities (a whistleblowing concern) you should report it under this policy.

This policy should not be used for complaints relating to your own personal circumstances, such as the way you have been treated at work.

If you are uncertain whether a concern is within the scope of this policy, you should seek advice from your manager.

4. RAISING A CONCERN

Spartan Relief Supplies Limited encourages employees, as a first step, to speak to their managers. They may be able to agree a way of resolving your concern quickly and effectively.

Where the matter is more serious, or you feel that your manager has not addressed your concern, or you would simply prefer not to raise the issue directly with your manager for any reason, concerns can be referred to the Directors of the Company.

5. CONFIDENTIALITY

Employees are not encouraged to make disclosures anonymously as a comprehensive investigation may be more difficult or impossible if further information cannot be obtained from you. It is also more difficult to establish whether any allegations are credible and have been made in good faith should an anonymous disclosure be made.

It is however the Company's intention that employees feel able to voice whistleblowing concerns openly. If you want to raise your concern confidentially, every effort will be made to keep your identity secret and to handle your report with discretion.

6. INVESTIGATION AND OUTCOME

The Company is committed to conducting any investigation in a timely, objective and thorough manner.

Once you have raised a concern, an initial assessment will be carried out to determine the scope of any investigation. You may be required to attend additional meetings in order to provide further information.

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In some cases, an investigator or a team of investigators may be appointed including employees with relevant experience of investigations or specialist knowledge of the subject matter. The investigator(s) may make recommendations for change to enable us to minimise the risk of future wrongdoing.

The Company will aim to keep you informed of the progress of the investigation and its likely timescale. You will be informed of the outcome of the investigation. However, sometimes the need for confidentiality may prevent us giving any specific details of the investigation or any disciplinary action taken as a result. You should treat any information about the investigation as confidential.

If it is concluded that a whistle-blower has made false allegations maliciously, in bad faith or with a view to personal gain, the whistle-blower may be subject to disciplinary action.

7. IF YOU ARE NOT SATISFIED

The outcome you are seeking cannot always be guaranteed. It should be noted however that your concern will be dealt with fairly and in an appropriate manner. By following this policy, you can help us to achieve this.

If you are not satisfied with the manner in which your concern has been handled, you may contact the Directors of the business.

8. PROTECTION AND SUPPORT FOR WHISTLEBLOWERS

We are committed to ensuring that employees do not suffer any detrimental treatment as a result of raising a concern.

Openness is encouraged and employees who raise genuine concerns in good faith under this policy will be supported, even if they turn out to be mistaken.

If you believe that you have suffered any such detrimental treatment, you should inform the Directors of the business immediately. If the matter is not remedied, you should raise it formally using the grievance procedure.

Employees must not threaten or retaliate against whistle-blowers in any way. Anyone involved in such conduct will be subject to disciplinary action.

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