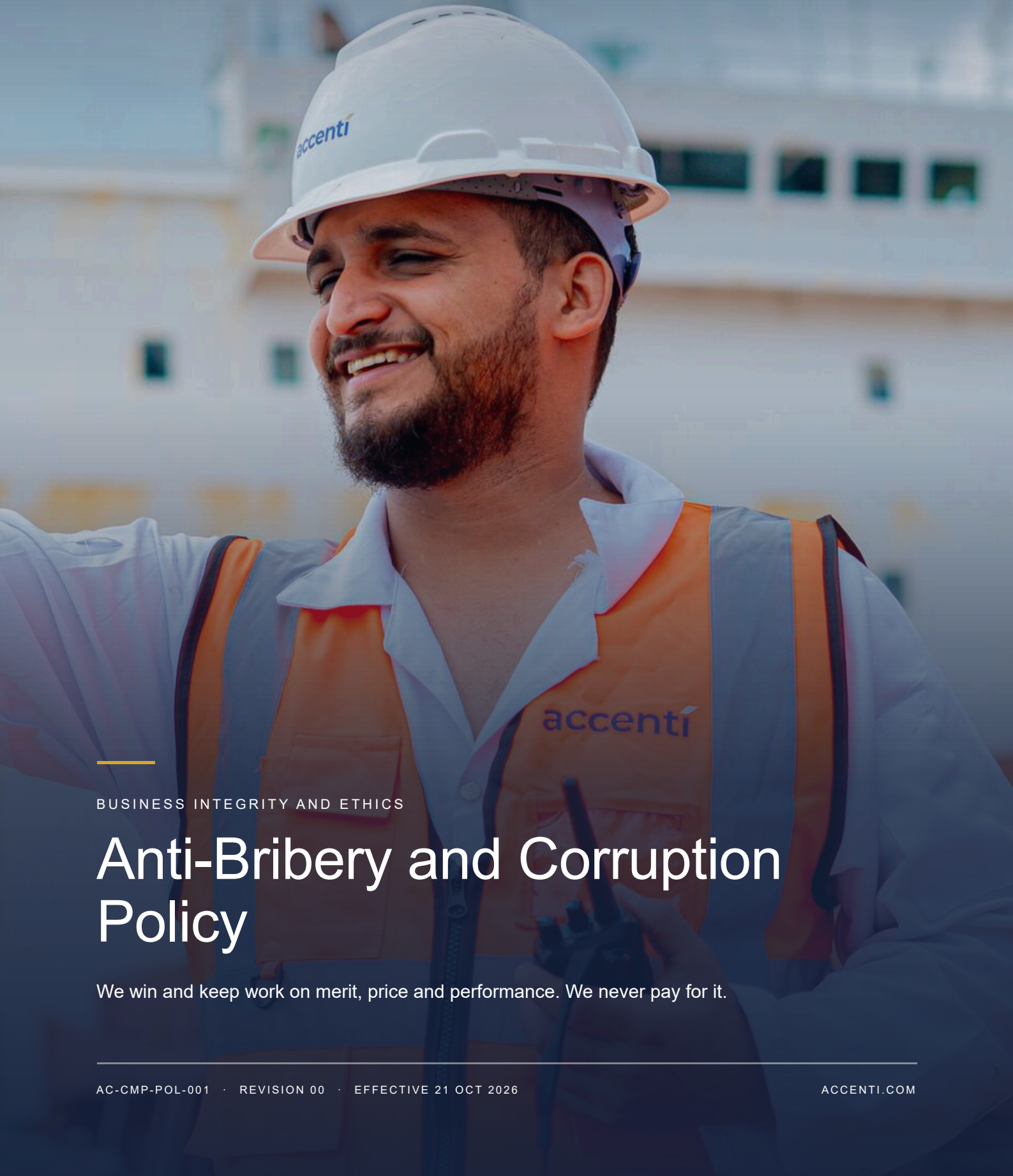




BUSINESS INTEGRITY AND ETHICS

Anti-Bribery and Corruption Policy

We win and keep work on merit, price and performance. We never pay for it.

Date 21 October 2026
Reference AC-CMP-POL-001 · Revision 00
To All directors, employees, temporary personnel and third parties acting on behalf of Accenti LLC

Issue of the Anti-Bribery and Corruption Policy, AC-CMP-POL-001, Revision 00

Dear colleagues,

I am pleased to issue the Accenti Anti-Bribery and Corruption Policy, effective 21 October 2026. It applies to every person who works for Accenti and to every agent, contractor, supplier and partner who acts on our behalf.

Our clients include international organisations, diplomatic missions and government programmes that rely on us to act with integrity. We win and keep work on merit, price and performance. We do not offer, give, request or accept bribes, and we do not make facilitation payments, whatever the local practice.

Managers are responsible for making sure their teams and the third parties they engage understand this policy, and that gifts, hospitality and conflicts of interest are declared and recorded. Finance will maintain the controls and registers that support it.

If anyone asks you for a payment or favour to influence a decision, refuse it and report it. No one will be penalised for refusing to pay a bribe, even if Accenti loses business as a result. Compliance is mandatory.

Yours sincerely,


Ali Ahmed Dhadhaow
Chief Executive Officer
Accenti LLC



ADDRESS

Accenti Compound, Marina Hub
Marine Road, Airport Zone
Mogadishu 0100, Banadir, Somalia
T +252 615 540 606

WEB

www.accenti.com
info@accenti.com

DEFENSE INFRASTRUCTURE

MISSION SUPPORT

Anti-Bribery and Corruption Policy

DOCUMENT	REVISION	EFFECTIVE	STATUS
AC-CMP-POL-001	00	21 Oct 2026	Approved / Issued
APPROVAL AUTHORITY		POLICY OWNER	
Accenti LLC Management		Finance Department (Compliance)	
APPROVED BY		APPROVED ON	NEXT REVIEW
Ali Ahmed Dhadhaow, Chief Executive Officer		21 Oct 2026	21 Oct 2027

Controlled document. Approval is evidenced by the signed and sealed cover letter. The current revision is held by Finance (Compliance); printed copies are uncontrolled.

Accenti LLC prohibits bribery and corruption in every form. No person acting for Accenti shall offer, give, request or accept anything of value to improperly influence a decision.

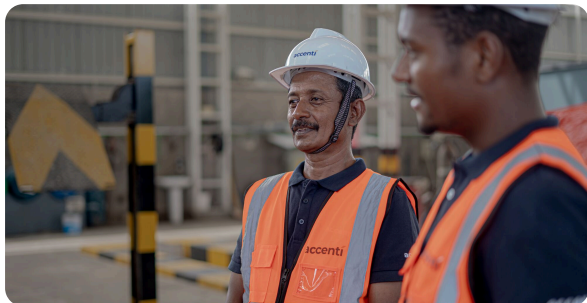
1 Application

This policy applies to directors, officers, employees and temporary personnel, and to agents, consultants, contractors, subcontractors, suppliers, customs brokers, freight forwarders and partners acting on behalf of Accenti LLC. It covers dealings with public officials, client representatives, international organisations, diplomatic missions and private companies, in every country where Accenti works.

2 Mandatory requirements

- 2.1 Bribery prohibited. No person shall offer, promise, give, request, agree to receive or accept a bribe, whether money, gifts, hospitality, employment, contracts, donations or any other advantage, directly or through a third party, to induce or reward improper performance.
- 2.2 Facilitation payments. Facilitation or "speed" payments to officials, such as to clear goods, obtain permits or pass checkpoints, are prohibited regardless of local practice. The only exception is a payment demanded under threat to life, health or liberty: personal safety comes first, and the payment shall be reported to management immediately and recorded accurately.
- 2.3 Gifts, hospitality and entertainment. Gifts and hospitality may be given or received only if modest, infrequent, transparent, never cash or cash-equivalent, not connected to a tender or pending decision, and permitted by the recipient's own rules. All gifts and hospitality shall be recorded in the register; anything above the threshold set by management, and anything offered to a public official, requires prior approval.

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- 2.4 Third parties and due diligence. Agents, intermediaries, subcontractors and suppliers shall be screened before engagement for ownership, reputation, sanctions and links to officials. Contracts shall include anti-bribery and audit clauses. Payments shall be made only against documented, genuine services at market rates, into an account in the contracted party's own name.



— Decisions are made on merit and recorded — never traded for favours.



— Port, customs and permit interfaces follow documented, auditable channels.

-
- 2.5 Conflicts of interest. Personal, family or financial interests that could influence, or appear to influence, a business decision shall be declared in writing. A person with a conflict shall take no part in the related procurement, recruitment or approval decision.
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- 2.6 Procurement, tenders and client dealings. Procurement shall be competitive and documented. Collusion, bid-rigging and the misuse of confidential tender information are prohibited. Client procurement rules and supplier codes of conduct, including those of the United Nations and other international organisations, shall be observed.
-
- 2.7 Political and charitable contributions. No political contribution shall be made on behalf of Accenti. Charitable donations and community contributions require management approval, shall go to legitimate organisations, be recorded transparently and never be linked to a business decision.
-
- 2.8 Accurate books and records. All transactions shall be recorded accurately and completely. Off-book accounts, false or inflated invoices and disguised payments are prohibited, and the use of cash shall be minimised and controlled.
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3 Speaking up and non-retaliation

Any request for a bribe, suspected bribery or breach of this policy shall be reported immediately to a line manager, to Finance (Compliance) or directly to the Chief Executive Officer, in confidence. No person shall be penalised for refusing to pay or accept a bribe, even if Accenti loses business as a result. Retaliation against anyone who raises a concern in good faith is a disciplinary offence.

4 Responsibilities and enforcement

Management shall set the tone, provide resources and approve exceptions. Finance shall maintain financial controls, the gifts and hospitality register, conflict declarations and due-diligence records. Managers shall

ensure their teams and the third parties they engage comply. Breaches shall result in disciplinary action up to dismissal, termination of third-party contracts and, where required, referral to the competent authorities.

5 Implementation and review

Training shall be given at induction and refreshed at least annually for higher-exposure roles, including procurement, logistics, customs, business development and finance. Personnel in those roles shall make an annual declaration of compliance and conflicts of interest. Registers shall be reviewed periodically and this policy reviewed at least annually or after any suspected breach, change in law or material change.

6 Reference framework

This policy is intended to align with the following, as applicable. Where requirements differ, the stricter standard applies. This document is company policy, not a certification of compliance with any standard.

- 01 Anti-corruption law of the Federal Republic of Somalia.
- 02 UAE Federal Decree-Law No. 31 of 2021 (Crimes and Penalties Law), including its bribery provisions.
- 03 Where they apply to Accenti's dealings or clients, the UK Bribery Act 2010 and the US Foreign Corrupt Practices Act.
- 04 The United Nations Convention against Corruption and the UN Supplier Code of Conduct.
- 05 ISO 37001 Anti-bribery management systems, as guidance.

 We win work on merit. We never pay for it.

Questions about this policy?

Policy queries and concerns go to Finance (Compliance) or directly to the Chief Executive Officer. Reports are handled in confidence.

Operations — Somalia

Accenti Compound, Marina Hub
Marine Road, Airport Zone
Mogadishu 0100, Banadir, Somalia

Headquarters

United Arab Emirates

Contact

T +252 615 540 606
E info@accenti.com
W www.accenti.com

Policy owner

Finance Department (Compliance)
AC-CMP-POL-001 · Revision 00

■ On every site

Say no, then speak up

If anyone asks you for a payment, gift or favour to influence a decision, refuse it and report it to Finance (Compliance) or the Chief Executive Officer.

info@accenti.com →





Zero harm to people, property and the environment.

Construction · Facility Management · Logistics
Asset Management & Fleet · Workforce Solutions