

ANTI-CORRUPTION POLICY

Bentry Company Ltd is committed to conducting our business in accordance with Ghana Anti-Corruption Legislation and other applicable laws related to its operations. This includes but not limited to the U.S. Foreign Corrupt Practices Act, as amended (FCPA) and the U.K. Bribery Act 2010 (UKBA).

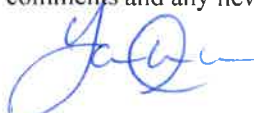
This Policy supplements the Code of Business Conduct and Ethics of the company and all other applicable laws. It also provides guidelines for the company's operations all the time and everywhere.

In pursuance of achieving zero tolerance approach to Bribery and Corruption, Management will ensure all Staff, Suppliers and Sub Contractors of Bentry are trained to understand and abide by this Policy and all other Code of Ethics that are applicable. Management and all other staff, suppliers and sub-Contractors will:

1. be committed to acting professionally, fairly and with integrity in all our dealings wherever we operate.
2. implement and enforce effective systems to counter Bribery and Corruption prohibit bribery and other corrupt conducts in any form
3. train all staff, suppliers, and sub-contractors to see Bribery and Corruption as illegal.
4. not offer any form of reward to persuade or influence anyone to render favorable services to our company,
5. not accept any form of reward to persuade or influence any representative of Bentry Company Ltd to render any form of favorable service to any giver of the reward
6. no Bentry Company Ltd representative will misuse any form of entrusted power for his or her private gains,
7. no Bentry Company Ltd representative directly or indirectly may offer, promise, pay, give or authorize any financial or any other thing of value to any other person or organization with the intent to exert improper influence over the recipient to induce the recipient to violate his or her duties, secure an improper advantage for the Company or improperly reward the recipient for past conduct.
8. an appropriate action or dismissal will be taken by the Company against any Company Representative who violates this policy.

Our policy statement will be displayed prominently in all work areas and made easily accessible to all employees. Any person who has legitimate reason to have a copy of the policy can do so and a copy will be furnished. This policy is available in large print.

This Anti-Corruption Policy will be reviewed annually by the management, taking into consideration employee comments and any new legislature or approved code of practices that may affect it.



Yaw A. Kankam

Managing Director



updated January 2020