STERLING INTERNATIONAL CONSULTING · CORPORATE POLICY

Business Ethics Policy

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Purpose and scope

This policy sets out our ethical business practices. It applies to all employees, in relation to our dealings with our people, agents, clients, suppliers, freelancers, certification bodies, training institutes, subcontractors, competitors, government officials, the public and investors in all our operating countries.

Policy objectives

We have a duty to act responsibly and to show the highest levels of ethical and moral stewardship. The objectives of this policy are to:

- Support our commitment to be a responsible business and develop mutually beneficial and sustainable relationships with our stakeholders, based on trust and co-operation;
- Treat all our stakeholders appropriately; and
- Promote safe and fair working conditions, including the responsible management of environmental and social issues within our context of organization, by ensuring our suppliers comply with our Supplier Code of Conduct, our policies and other legal requirements.

Requirements

Zero tolerance to bribery and corruption

Bribery and corruption will not be tolerated. It is not acceptable to:

- Give, promise to give, or offer, a payment, gift or hospitality with the expectation or hope that a business advantage will be received, or to reward a business advantage already given, or to facilitate or expedite a routine procedure;
- Request, agree to receive or accept payment from a third party that is known or suspected to have been offered with the expectation that it will obtain a business advantage from Sterling International Consulting;
- Participate in any activity that might lead to or suggest that a facilitation payment or kickback has been made or accepted by Sterling International Consulting;

- Accept a gift or hospitality from a third party if it is known or suspected to have been offered or provided with an expectation that a business advantage will be provided to Sterling International Consulting in return; or threaten or retaliate against another employee who has refused to commit a bribery offence or who has raised concerns under this policy.
- All reasonable suspicions must be reported in line with the whistle-blowing procedure and any acts of bribery will be notified by Sterling International Consulting to the relevant government agency. Any acts of bribery and other forms of corruption, and failure by any employee to report such acts when they reasonably suspect or know another employee has committed them, will be treated as gross misconduct and may result in summary dismissal.

Zero tolerance to fraud

All employees, subcontractors, agents and suppliers must act honestly and with integrity at all times. All reasonable suspicions of fraud must be reported in line with the whistle-blowing procedure. No accounts must be kept "off the book" to facilitate or conceal improper payments.

Expenses and entertainment

All expenses and entertainment must be in accordance with the Business expenses and entertaining procedures.