

 <b>HORATIO LIMITED</b>	Document Title:	<b>ANTI-BRIBERY &amp; CORRUPTION POLICY</b>	Version:	<b>01</b>
	Document Number:	<b>HL-QHSE-ABCP-72</b>	Issued Date:	<b>APRIL 2022</b>

Horatio Limited is a Civil Engineering Company which provides unparalleled civil engineering services (commercial, residential, interior design, furniture and roads), MEP Services (mechanical, electrical and plumbing) and procurement services through continuous improvement and management of internal system created to consistently meet customers' requirements.

Horatio Limited takes a **zero-tolerance** approach to bribery and corruption and is committed to acting professionally and with integrity in all its business dealings and relationships. The Board of Directors of Horatio Limited has determined that its management shall formalise this policy in compliance with the all anti-corruption laws governing the Federal Republic of Nigeria. As part of our commitment to avoid acts which might reflect adversely upon the integrity and reputation of the Horatio Limited, we shall:

- ✚ Conduct all of our business with integrity and maintain high ethical standards while taking our legal responsibilities very seriously
- ✚ Ensure that this policy extends across all of the our business dealings and in all countries and territories in which we operate
- ✚ Ensure employees do not accept a payment, gift or hospitality from a third party if they have knowledge or suspect that it is offered or provided with an expectation that a business advantage will be provided by Horatio Limited in return
- ✚ Ensure that the non-compliance to this policy by any employee of Horatio Limited shall result in criminal, civil penalties or disciplinary action (may include but not limited to summary dismissal) which will vary according to the offence
- ✚ Develop, implement, monitor and maintain a system of internal controls to facilitate compliance with this policy
- ✚ Ensure training on how to implement and adhere to this policy will form part of the induction process for all new Directors, Officers, Employees and Consultants prior to engaging in any business activity

This Policy does not prohibit normal and appropriate hospitality (given or received), in accordance with to or from third parties without any strings attached.

Top Management maintains the overall responsibility for the corporate performance of Horatio Limited's Integrated Management System, and have delegated the responsibilities and authorities for implementation of this policy to ALL employees at relevant functions.

Authorized by: **MR. EYADO OCHO (MD)**

Signature:



Date:

**APRIL 2022**