



ANTI-FRAUD & ANTI-BRIBERY POLICY

Africa Global Trade Link Ltd • Connecting Markets. Creating Opportunities.

Document Owner	Board of Directors / Compliance Officer	Version	1.0
Applies To	All directors, officers, employees, agents, brokers, consultants and third parties acting for the Company	Effective Date	[Insert Date]
Jurisdiction	Republic of Rwanda, and all countries where the Company conducts business	Next Review	[Insert Date]

01 POLICY STATEMENT

Africa Global Trade Link Ltd (“AGTL” or “the Company”) operates as an international trade, sourcing, brokerage and business facilitation company connecting buyers, sellers, suppliers, manufacturers and commercial partners across Africa and international markets, including sectors and jurisdictions that carry elevated bribery, corruption and fraud risk.

AGTL maintains a zero-tolerance approach to bribery, corruption and fraud in every market in which it operates. This applies without exception, regardless of local custom, competitive pressure, transaction value or counterparty seniority. Every director, employee, agent, broker, consultant and third party acting on the Company's behalf is required to comply with this Policy and with all applicable anti-bribery, anti-corruption and anti-fraud laws.

02 PURPOSE & SCOPE

This Policy sets out AGTL's standards for preventing, identifying and responding to bribery, corruption and fraud across its trade facilitation, sourcing, brokerage and market-access activities. It applies globally to:

- Directors, officers and employees of AGTL and any subsidiary;
- Agents, brokers, sourcing partners, consultants and other intermediaries acting for or on behalf of AGTL; and
- Suppliers, buyers, sellers, manufacturers and other counterparties, to the extent set out in the applicable commercial mandate or agreement.

03 KEY DEFINITIONS

Term	Meaning
Bribery	Offering, promising, giving, soliciting or accepting any financial or other advantage to induce or reward improper performance of a function or business decision.
Facilitation Payment	A small, unofficial payment made to a public official to secure or speed up a routine action (e.g. customs clearance, licensing). Prohibited under this Policy.
Fraud	Any dishonest act or omission intended to secure an unfair or unlawful gain, including false representations, falsified documents or misuse of Company assets.
Conflict of Interest	A situation where personal, financial or family interests could improperly influence, or appear to influence, a business decision made on behalf of AGTL.
Third Party	Any agent, broker, intermediary, consultant, supplier, counterparty or other person or entity that acts for, with, or on behalf of AGTL.

04 ANTI-BRIBERY & ANTI-CORRUPTION STANDARDS

4.1 Bribes, Kickbacks & Facilitation Payments

No director, employee, agent or third party may offer, promise, give, request or accept a bribe, kickback or facilitation payment, in cash or in kind, to or from any person — including public officials, customs or licensing authorities, and private-sector counterparties — in order to obtain or retain business or an improper advantage.

4.2 Gifts, Hospitality & Entertainment

Gifts and hospitality exchanged with counterparties, agents or officials must be reasonable, infrequent, proportionate, and never intended or perceived as an inducement. The following thresholds apply:

Value	Requirement
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Below USD 50 (nominal)	Permitted; log in the Gifts & Hospitality Register if offered or received.
USD 50 – USD 250	Requires prior notification to line manager and entry in the Register.
Above USD 250, or any gift to/from a public official	Requires prior written approval from the Compliance Officer before acceptance or offer.
Cash or cash equivalents	Never permitted, in any amount, in any direction.

4.3 Public Officials & Government Contacts

Because AGTL's trade facilitation and brokerage activities may involve customs, licensing, permitting and other regulatory touchpoints, particular caution applies to any dealing with public officials. No payment, gift or favour may be offered to expedite customs clearance, licensing, permits, inspections or other official action. Legitimate, transparent government fees must be paid through official channels only.

4.4 Political & Charitable Contributions

AGTL does not make contributions to political parties, candidates or campaigns. Any proposed charitable or community contribution must be genuine, properly documented, and approved in writing by the Compliance Officer before it is made.

4.5 Agents, Brokers & Intermediaries

Given AGTL's role in connecting counterparties across multiple jurisdictions, third parties acting on the Company's behalf present a heightened risk area. Before engagement, AGTL will:

- Conduct risk-based due diligence on the third party, including identity, beneficial ownership and business reputation;
- Confirm that commission or fees are commensurate with legitimate services actually performed;
- Enter into a written agreement including anti-bribery and anti-fraud undertakings and audit rights; and
- Decline or terminate any arrangement involving payment to an undisclosed party, an offshore account unrelated to the transaction, or a third country with no connection to the underlying business.

05 ANTI-FRAUD STANDARDS

5.1 Financial & Trade Documentation Integrity

AGTL requires accurate, complete books, records and trade documentation. No employee, agent or third party may falsify, alter or misrepresent invoices, certificates of origin, quality or inspection certificates, shipping, customs or compliance documentation, or any other record relied upon by AGTL or its counterparties.

5.2 Misrepresentation

Employees and third parties must not misrepresent products, suppliers, buyers, quantities, capacity, ownership or authority to act when facilitating an introduction, sourcing mandate or brokerage transaction.

5.3 Conflicts of Interest

All directors, employees and agents must disclose to the Compliance Officer any personal, family or financial interest in a supplier, buyer, competitor or counterparty that could influence — or appear to influence — a business decision made on behalf of AGTL, before proceeding with the related activity.

5.4 Counterparty Due Diligence, KYC & Sanctions Screening

Consistent with AGTL's responsible sourcing standards, counterparties and third parties are screened, on a risk basis, against applicable sanctions and restricted-party lists, and asked to provide company registration, authorised representative identification, and relevant licensing or compliance documentation before a transaction proceeds, particularly for higher-risk categories such as minerals and metals.

06 WARNING SIGNS TO WATCH FOR

Personnel should treat the following as red flags requiring escalation to the Compliance Officer before proceeding:

Payments & Commissions	Documentation & Counterparties
Requests for payment to an undisclosed third party, offshore account, or unrelated jurisdiction	Reluctance or refusal to provide registration, ownership or licensing documents
Unusually generous or unexplained commissions relative to services performed	Inflated, backdated or inconsistent invoices and certificates
Requests for cash payment or urgency to bypass normal approval steps	Undisclosed family, personal or financial ties to a counterparty
Pressure to waive or shortcut due diligence for a public official or agent	Counterparties appearing on sanctions or adverse-media screening

07 REPORTING CONCERNS — SPEAK UP

Anyone who suspects bribery, corruption or fraud involving AGTL's business — employees, agents, suppliers, buyers or other counterparties — is expected and encouraged to report it promptly through any of the following channels:

- Their line manager or the relevant AGTL contact for the transaction;
- The Compliance Officer, directly and in confidence: [Insert Compliance Contact Email]; or
- The confidential reporting channel: [Insert Reporting Hotline / Email].

AGTL will treat all reports confidentially, investigate promptly and fairly, and will not tolerate retaliation of any kind against anyone who raises a concern in good faith, even where the concern later proves unfounded.

08 ROLES & RESPONSIBILITIES

Board of Directors	Sets the tone from the top, approves this Policy and reviews its effectiveness annually.
Compliance Officer	Owens day-to-day implementation, approvals, due diligence, investigations and training.
Managers	Model compliant behaviour, support reporting, and escalate concerns without delay.
All Personnel & Third Parties	Comply with this Policy, complete required training, and report concerns promptly.

09 TRAINING, CONSEQUENCES & RECORDS

9.1 Training

All employees, and agents or intermediaries engaged in higher-risk activities, receive anti-bribery and anti-fraud training on joining AGTL and periodically thereafter.

9.2 Consequences of Breach

Breach of this Policy by an employee may result in disciplinary action up to and including dismissal. Breach by an agent, broker or other third party may result in immediate termination of the relevant agreement, and AGTL reserves the right to report suspected criminal conduct to the relevant authorities.

9.3 Record-Keeping

Due diligence records, the Gifts & Hospitality Register, training records and investigation files are retained in accordance with AGTL's record-retention requirements and made available to auditors or regulators on request.

10 POLICY REVIEW

This Policy is reviewed at least annually, and on any material change in law, business activity or risk exposure, by the Compliance Officer and the Board of Directors.

ACKNOWLEDGEMENT

I confirm that I have read, understood, and agree to comply with AGTL's Anti-Fraud & Anti-Bribery Policy.

Name		Date	
Role / Company		Signature	