

Policy for the Prevention of Corruption, Asset Laundering and Financing of Terrorism



STRACON Group is committed to maintaining high standards of integrity, ethics, and good corporate governance, therefore it rejects any act of corruption, asset laundering and/or financing of terrorism.

In this respect, STRACON Group is committed to the following guidelines in order to prevent any act of corruption, asset laundering and/or financing of terrorism:



1. "Zero Tolerance" towards any act of bribery, corruption, asset laundering and/or financing of terrorism.



2. Providing annual training to employees to prevent any act of corruption, asset laundering and/or financing of terrorism.



3. Compliance with the applicable legislation related to anticorruption, prevention of asset laundering and/or financing of terrorism in the jurisdictions where STRACON Group operates.



4. STRACON Group's records must be



5. Undertaking due diligence when contracting third-parties who act on behalf of STRACON Group, its providers and or employees.



6. Undertaking due diligence when evaluating clients and partners, in order to prevent the receipt of funds from illicit activities.



7. Requiring employees to report any case that contravenes this policy, including cases of bribery or black-

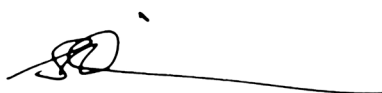


8. Under no circumstance should employees, directors and shareholders put their personal interests before those of STRACON Group.



9. Disciplining employees for any breach of our Code of Ethics and the Manual for the Prevention of Corruption, Asset Laundering and Financing of Terrorism, which could lead to the termination of the employment of those responsible.

Our Code of Ethics and the Manual for the Prevention of Corruption, Asset Laundering and Financing of Terrorism complements this Policy.

A handwritten signature in black ink, appearing to read 'SD', followed by a horizontal line.

Steve Dixon
Group CEO



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