

ANTI BRIBERY AND CORRUPTION POLICY

This Anti-Bribery and Corruption Policy establishes principles that must govern our conduct.

Bribery and corruption are not only against our Company values; they are illegal and can expose both the employee and the Company to fines and penalties, including imprisonment and reputational damage.

At Principal, bribery is never permitted. We will not seek to influence others, either directly or indirectly, by offering, paying or receiving bribes or kickbacks, or by any other means that is considered unethical, illegal or harmful to our reputation for honesty and integrity. Employees and representatives of the Company are expected to decline any opportunity which would place our ethical principles and reputation at risk. While certain laws apply only to bribes to government officials (domestic and foreign); this Policy applies to non-government business partners as well.

The purpose of this Policy is to:

- set out the responsibilities of Ascendant, and all individuals who work for Ascendant, in observing and upholding the Company's position on bribery and corruption; and
- Provide information and guidance to those individuals working for Ascendant on how to recognize and deal with bribery and corruption issues.

Managing Director
Tarek MECHRI

