

Anti-Bribery Policy

1. Introduction

1.1 Purpose

This Anti-Bribery Policy outlines the principles, guidelines, and responsibilities governing anti-bribery practices at Data Optico Pty Ltd. It is designed to ensure compliance with applicable anti-bribery legislation, including but not limited to the U.S. Foreign Corrupt Practices Act (FCPA), the UK Bribery Act, and South African anti-bribery laws. Data Optico Pty Ltd, a company licensed with technology from datari.io, is committed to conducting business with the highest ethical standards and integrity, refraining from offering, giving, receiving, or soliciting any items of value to improperly influence actions of another or to gain unjust benefit.

1.2 Scope

This policy applies to all employees, officers, directors, contractors, consultants, agents, and any other individuals representing Data Optico Pty Ltd. It encompasses all business activities and transactions conducted on behalf of Data Optico Pty Ltd, both domestically and internationally.

2. Definitions

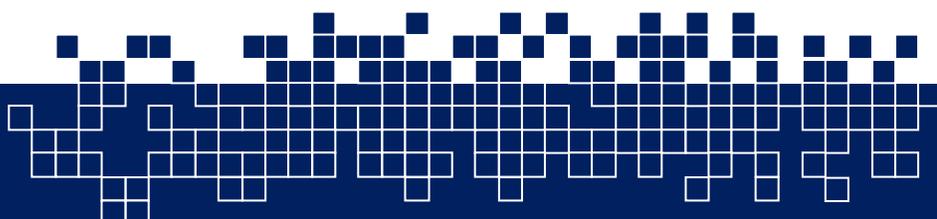
2.1 Bribery

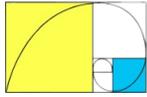
Bribery refers to the act of offering, giving, receiving, or soliciting any items of value, including but not limited to money, gifts, favors, or benefits, with the intention to improperly influence the actions of another person, organization, or government entity.

3. Compliance with Applicable Laws

3.1 Legal Compliance

Data Optico Pty Ltd commits to complying with all applicable anti-bribery laws and regulations in every jurisdiction in which it operates. This includes, among others, the U.S. Foreign Corrupt Practices Act (FCPA), the UK





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Bribery Act, and South African anti-bribery laws such as the Prevention and Combating of Corrupt Activities Act.

3.2 Prohibited Acts

All employees and representatives of Data Optico Pty Ltd are strictly prohibited from engaging in any form of bribery, whether directly or indirectly, in relation to business activities conducted on behalf of Data Optico Pty Ltd.

4. Gifts, Entertainment, and Hospitality

4.1 Permissible Gifts

Small, token gifts and hospitality that are of nominal value and are customary in the business context may be accepted or offered, provided they do not compromise objectivity, integrity, or impartiality in business decisions.

4.2 Approval and Records

Gifts, entertainment, and hospitality exceeding a nominal value require prior approval by the relevant department head or supervisor. Records of such transactions must be maintained and reported as per company policies.

5. Due Diligence

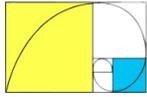
5.1 Third-Party Due Diligence

Before engaging with third parties, Data Optico Pty Ltd shall conduct due diligence to ensure that they adhere to anti-bribery and ethical standards consistent with those of Data Optico Pty Ltd.

6. Reporting and Whistleblowing

6.1 Reporting Suspected Bribery

Any employee or representative who suspects or becomes aware of potential bribery-related activities must immediately report their concerns to the designated compliance officer or a supervisor. Data Optico Pty Ltd encourages the reporting of such concerns without fear of retaliation.



7. Training and Awareness

7.1 Training Programs

Data Optico Pty Ltd shall provide anti-bribery training to employees and representatives to raise awareness of the policy and to ensure compliance with anti-bribery laws and regulations.

8. Consequences of Non-Compliance

8.1 Disciplinary Actions

Non-compliance with this Anti-Bribery Policy may result in disciplinary actions, including but not limited to termination of employment, contract, or business relationship. Violations may also lead to legal actions in accordance with applicable laws.

9. Review and Update

This policy will be reviewed and updated as necessary to ensure alignment with evolving anti-bribery legislation and international best practices, including South African anti-bribery laws.

10. Contact Information

For questions, concerns, or reporting of suspected bribery-related activities, employees and representatives should contact:

Ryno Mathee: Ryno@datari.io

By adhering to this Anti-Bribery Policy, Data Optico Pty Ltd is committed to conducting its business with integrity and in compliance with applicable anti-bribery laws, including those of South Africa, and international best practices.

Last updated: [18 September 2023]

