



# The SASPY Group LLC



## Anti-Bribery and Corruption Policy

### ANTI-BRIBERY AND CORRUPTION POLICY of: The SASPY Group LLC

Implementation date: January 31<sup>st</sup>, 2018

#### POLICY STATEMENT

The SASPY Group (TSG) has established an Anti-Bribery and Corruption policy to reinforce our intention and obligation to act honestly and ethically our business dealings. Bribery and corruption are not only against our Company values; they are illegal and can expose both our employees and our Company to fines, penalties and reputational damage.

At TSG, bribery is never permitted. We will not seek to influence others, either directly or indirectly, by 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.

Bribery is defined as an offering, giving or receiving anything of value with the intention of inducing a person to act or to reward a person for having acted. Items of value can include, but are not limited to the following:

- ) Cash and cash equivalents
- ) Political contributions
- ) Charitable contributions (if made to a charity at the request of a government official or private business partner)
- ) Job offers or internship awards

If an employee is offered a bribe from a person or entity doing business with or seeking to do business with the Company, they are required to report it immediately.

#### **Third parties**

Companies cannot avoid liability by using a third party to give or receive a bribe. A third party includes, but is not limited to consultants, agents, representatives, subcontractors, and salespeople. We require third parties to agree in writing to remain in compliance with all relevant anti-corruption laws in addition to our Company's anti-bribery and corruption policy.



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### Government officials

Law and regulations are strict when dealing with government officials. Reasonable corporate hospitality that is acceptable with other business associates might not be allowable when government officials are involved. A government official is any individual that is elected or appointed to, or hired by, any governmental or quasi-governmental entity. A non-US government official is any employee of a foreign government, or of an entity owned or controlled by a foreign government, or any candidate for foreign political office or those acting on their behalf.

The SASPY Group LLC has prepared, reviewed, and implemented the above Anti-Money Laundering Policy and Procedure as of January 31<sup>st</sup>, 2018.

On Behalf of The SASPY Group LLC I, Jovanni Philbrick, the active Managing Member and signatory for the company accept and acknowledge the above Policy and Procedure implementation.

Signature:   
Printed Name: Jovanni Philbrick  
Title: Managing Member  
Passport No: 555002262  
Country of Origin: USA

Signature:   
Printed Name: Serjio Philbrick  
Title: Operations Manager  
Passport No: 486479242  
Country of Origin: USA

  
REG# 764485  
FED# 82-0640080  
Date: 01.31.18  
USA. UAE. S.Africa