



ANTI-BRIBERY POLICY STATEMENT

Scope of services: Bestcomp Group CJSC is a provider of System Integration, Business Automation Solutions, Data Center, Server and Storage, Enterprise IT Security, and Networking Solutions, Power and Cooling Solutions, Structured Cabling Systems, Audio and Video Solutions, Application and Software Development, Consulting and Outsource Services, Distributorship, Sales, Technical Support, and Service.

Our commitment: Bestcomp Group CJSC is committed to comply with all applicable laws, standards, codes, client's needs, expectations, and relevant requirements to achieve high standards of Anti-Bribery performance. Our processes are structured into a documented Anti-Bribery Management System, which meets the requirements for ISO 37001:2016 International Standard. We take the obligation to apply in our activities to the principles and methods described below:

- **Legal Requirements:** We will commit to comply with all applicable to our scope of work legal requirements. Despite the official requirements set by the Legal and Regulatory authorities in Azerbaijan, we see these as the minimum requirements and we may choose to apply stricter compliance requirements where we see the additional benefits, such as reduction of risks, client property damage, environmental impact, etc.
- **Management of Risks:** Bestcomp Group CJSC provides risk-based management to ensure that all the risks related to anti-bribery, which may directly or indirectly affect activities of our organization will be assessed, available hazards identified, and effective control measurer applied.
- **Continuous improvement:** We will promote the continuous improvement of the Anti-Bribery Management System through the implementation of best practices and the visible leadership, commitment, involvement of the line management and employees' participation.
- **Objectives and Targets:** We will identify the objectives for Anti-Bribery related issues and set the targets to achieve them for each year of operations, which will be reviewed on annual basis by senior management. Training of employees will be an integral part of the strategy to achieve the objectives.
- **Resources:** All necessary resources such as intellectual, financial, informational, assets and others will be provided by company management to achieve planned objectives and targets.
- **Interested parties:** The Anti-Bribery company staff and our clients, suppliers, and other interested parties are most important for us. We will take all applicable measures to ensure informational security of employees and related persons.
- **External and internal issues:** Any issues that could influence the purpose and the strategic direction of the organization such as changes in regulations, increased competition, new market requirements, new expectations of interested parties, staff morale, new information security requirements and others will be always considered.
- **Responsibilities:** It's the duty of each employee comply with requirements of this Anti-Bribery policy and cooperate with the management to ensure that the system as safe as possible. Employees shall report to management any concerns, which may have affected the Anti-Bribery policy of our operations. **Chief Executive Officer (CEO)** has overall responsibility for Anti-Bribery within the Company. He monitors the effectiveness of this policy. All employees carrying out their activities within BestComp Group CJSC are obliged to implement these policy principles.
- **Communication:** The Anti-Bribery Policy principles will be always communicated and available to staff. To involve our customers, and any interested parties with a legitimate interest in our business, this Policy Statement is made available on our website.
- **Principles of Information Security Policy:** Despite our major operations in Azerbaijan, we are bound by best-practice international standards. Company has a zero-tolerance policy towards bribery and corruption. Company employees and others working on its behalf may not offer, promise or give a bribe to anyone, and may not request, agree to accept, or take a bribe from anyone. Employees of Companies shall refrain from accepting gifts or benefits that might influence their impartiality, decisions, and conduct; and from offering such gifts and benefits to third party persons and organizations.

Chief Executive Officer (CEO): Farid Hasanov

Revision Date: 07.01.2024