

ESPY TECHNICAL SERVICES LIMITED

ANTI-CORRUPTION

POLICIES AND PROCEDURES

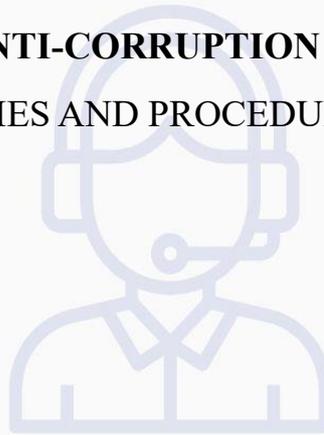


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ANTI-CORRUPTION POLICY

INTRODUCTION

The ESPY Technical Services Limited Charter: Transforming Our World.

1. ESPY Technical Services Limited is cognizant of GOD and the Resolution adopted at the United Nations General Assembly Seventieth Session, Agenda items fifteen (15) and One Hundred and Sixteen (116) on the 25th of September 2015. We can only limit ourselves by not achieving the 2030 Sustainable Development Goals (SDGs) of the United Nations.
2. ESPY Technical Services Limited is an analytical think tank of professionals. We are skilled in Health-related engineering and technology, operations management, facilities systems, and procurement processes. We work in conjunction with our sister company, ESPY Technical Services Limited, which has sourced equipment, parts, and services products for hospitals in Trinidad.
3. ESPY Technical Services Limited shall provide complete Healthcare solutions to our local and regional medical sector to realise SDG 3 to “*ensure healthy lives and promote well-being for all at all ages¹.*” Our mission is to foster the continuous development of leaders and organizations within the medical industry whilst pursuing strategically sustainable engineering solutions that benefit mankind.
4. Research and development with a clear focus on complete patient healthcare needs, our company shall promote and foster the latest technological advancement(s) that serve our customers within the Americas. Our core objectives are as follows:
 - i. To provide healthcare Technology management and clinical Engineering solutions to the Caribbean.
 - ii. The provision of medical device services and sales for the Caribbean through our affiliates and manufacturers.
 - iii. To be the market leader in the development, sales, and services of Medical 3D printing for the Caribbean.

¹ United Nations Department of Economic and Social Affairs, Sustainable Development, Goals, 3, “Ensure healthy lives and promote well-being for all at all ages” [Goal 3 | Department of Economic and Social Affairs \(un.org\)](https://www.un.org/sustainabledevelopment/goals/)



Partnership for the Goals

5. ESPY Technical Services Limited has partnered with The Quantum Foundation (TQF), a non-governmental, non-profit company registered in Trinidad and Tobago that promotes the Sustainable Development Goals and the United Nations Global Compact (UNGC).
6. TQF has taken up the challenge put forward by Mr. Kofi Annan, seventh Secretary-General of the United Nations, to ensure that sustainable development becomes a reality for everyone worldwide. We are committed to implementing this framework to drive economic growth, promote social justice, and encourage environmental stewardship. The ESPY Technical Services Limited Charter has specifically adopted the Sustainable Development Goal (SDG) 3 targets, “Ensure healthy lives and promote well-being for all at all ages,” in executing its mandate.
7. ESPY Technical Services Limited intends that all workers be employed by TQF and reassigned to the specific company to promote the efficiency of our operations, as well as Goal 17, Partnership for the Goals. ESPY Technical Services Limited is currently undergoing a restructuring process wherein all employees will be hired directly under TQF and reassigned to ESPY Technical Services Limited as part of our bespoke business model to promote NGO capacity building, the Sustainable Development Goals, and the United Nations Global Agenda.
8. The Global Compact speaks to private sector partnership and commitment to the international standard set by the 2030 Agenda. This is our attempt to ensure its accelerated implementation, particularly within the Latin American and Caribbean (LAC) Region. TQF provides capacity building and business process outsourcing services to ensure that our internal policies and guidelines comply as far as possible with international standards regarding labor rights, anti-corruption, environmental sustainability, and human rights.
9. We have adopted TQF’s policy documents and commit to engaging TQF as our partner to monitor and evaluate our compliance with the standards and recommend relevant implementation methods going forward. Currently, TQF provides capacity building and business process outsourcing services for various companies. All contracts stemming from TQF are preloaded with a commitment to the UNGC as part of their terms of reference.



10. ESPY Technical Services Limited aims to partner with The Quantum Foundation to realise a partnership with the World Health Organisation. This is to secure the accelerated implementation of SDG 3: Good Health and Well-Being.

Applicability:

11. This policy applies to all departments and teams at ESPY Technical Services Limited that are involved in planning, executing, and evaluating actions and projects.

12. At ESPY Technical Services Limited, our commitment to the Anti-Corruption Policy underscores our dedication to achieving excellence in all facets of our operations. We understand that efficient action implementation and thorough evaluation are crucial to attaining our strategic goals and maintaining high standards of performance and accountability.

Objective:

13. To outline a clear policy on the Formal structures addressing our corporate commitment to anti-corruption, as required by the [United Nations Global Compact Anti-Corruption Principle 10](#) addressing:

Businesses should work against corruption in all its forms, including extortion and bribery.

14. This policy aims to establish a framework to prevent, detect, and respond to corruption and bribery within our organization. It ensures that all business activities are conducted ethically and transparently.

15. ESPY Technical Services Limited upholds a strict policy of zero tolerance for corruption. All employees and partners must adhere to the highest standards of honesty and integrity. The involvement in or endorsement of corrupt practices is explicitly forbidden. We expect all staff members to fully embrace and comply with these standards, which extend to all our internal and external stakeholders, partners, and clients.

Implementation:

16. ESPY Technical Services Limited has established a cross-functional committee to address our commitment to the UNGC and our corporate commitment to anti-corruption, anti-money laundering, and counter-terrorist financing initiatives. We have



partnered with The Quantum Foundation assess our compliance with company policy catered to the Principles of the Global Compact.

The Cross-Functional Committee on Anti-Corruption, Principle 10 of the UNGC.

17. ESPY Technical Services Limited falls within the category of a small to medium enterprise. Noting this reality and its effect on our organizational structure, we have taken additional steps to protect and prevent the risk of corruption to showcase our commitment to the Principles of the Global Compact. One of these steps is the implementation of a Cross-Functional Committee on Anti-Corruption.
18. The Committee shall comprise a representative of Senior Management (CEO or someone with delegated authority), a representative of TQF who has been engaged as our partner overseeing our implementation of and compliance with internal policy and international best practices, and a selected staff representative who shall be responsible for communicating the committee's recommendations to staff and stakeholders.
19. Role and Function of the Cross-Functional Committee Members:
 - i. Representative of Senior Management—Understand and approve the recommendations of TQF and ensure their implementation into company policy. Where divergent opinions occur, senior management is responsible for ensuring that said discrepancies are resolved and that the company can move forward with settled opinions on challenging issues. Senior management must identify priority areas for risk assessment activities and ensure that due diligence is always performed so that any potential negative impact on sustainability can be identified, prevented, or mitigated.
 - ii. TQF- assesses the company's existing policies and ensures compliance. These policies must then be assessed against international best practices so that there is a constant monitoring and evaluation process as we advance so that progress never stagnates. TQF must then communicate its findings by reporting to senior management and frequently liaising with that arm of the committee to ensure that the partnership achieves its aim of promoting compliance with the UNGC. TQF must then recommend progressive action to ensure that the company direction aligns with the Ten Principles and evaluate the implementation of its recommendations annually. TQF shall also be responsible for conducting



training sessions on company policies to assist with communication and understanding.

- iii. Staff Representative- is responsible for communicating the decisions of the Committee to staff and stakeholders. While not responsible for compliance, this role is essential to ensuring that the relevant policies are accurately communicated company-wide and understood. Should further questions or challenges arise, the staff representative is obligated to refer persons to TQF or directly to senior management so that any concerns may be effectively and efficiently addressed. A code of confidentiality covers all referrals, and all staff and stakeholders must be assured that no adverse reaction shall emanate from any action related to this policy.

Risk Assessment and Due Diligence

20. A clear and structured process guides ESPY Technical Services Limited's approach to risk assessment and due diligence reporting per this policy guideline.

21. Risk Assessment Guidance:

Identifying the Risk:

The prevention of corrupt activity must begin with sufficient knowledge and training for staff so that employees may identify instances of corrupt or potentially corrupt activity.ⁱ Therefore, our risk assessment guidance begins with ensuring that staff is periodically trained in this area by in-house legal experts. Our selected partner, The Quantum Foundation, approved our training program, and training is implemented in partnership with TQF. The following thematic areas have been identified:

- i. Legal risks
- ii. Commercial and operational risks
- iii. Reputational risks

ESPY Technical Services Limited is also committed to engaging third-party auditors to examine the company's financial statements and to assist in forecasting and preparing budgetary documents for the following financial year. This mechanism provides another layer of corruption risk assessment activity via a third-party partner, ensuring an independent assessment of the Company across all material levels, yielding a robust risk-assessment process.

22. Mitigating the Risk:



Due to our size as a Small to Medium Enterprise (SME), we have implemented several initiatives to ensure sufficient oversight of company activities:

- i. Monitoring serves as a fundamental element of our implementation strategy. ESPY Technical Services Limited utilizes established performance metrics and conducts regular reviews to track progress, allowing us to address any challenges and maintain project momentum effectively. This continuous oversight ensures that our actions align with our objectives and that any deviations are promptly addressed. Our company is young and still streamlining our activities, having introduced our policy commitments on the Global Compact. The next step is to continue monitoring our policy objectives while assessing this against international best practices.
- ii. There is increased managerial oversight when engaging new partners or third parties, coupled with tailored training for senior management in decision-making positions to continuously update their ability to identify, mitigate, and prevent risks attached to anti-corruption principles. We also require increased due diligence mechanisms when engaging suppliers or making significant investments. We review these internal mechanisms periodically through our partnership with TQF to ensure that our risk strategy to minimize our overall risk exposure can stand the test of the international system. Before a third party is engaged, the following is considered:
 - a. Legal status and type of organization, as well as the jurisdiction of incorporation.
 - b. Assessment of ownership structure, including financial management and affiliated entities.
 - c. Determination of any actual or potential conflict of interest.
 - d. Business reputation of intended partner.
 - e. Business partner's internal anti-corruption program.



- f. Business partner’s willingness to abide by our anti-corruption policy and commitment to the United Nations Global Compact.

- iii. Evaluation constitutes an essential component of our unwavering dedication to continual enhancement. ESPY Technical Services Limited meticulously evaluates the abovementioned against predetermined objectives and key performance indicators, as required by the United Nations Practical Guide on Anti-Corruption Ethics and Compliance Programme for Business. This data-centric approach empowers us to make well-informed decisions and refine our strategies to achieve even more superior outcomes in the future.

- iv. Transparency and accountability are fundamental principles of ESPY Technical Services Limited’s policy. The Company provides our stakeholders with regular progress reports and comprehensive final evaluation reports. This ensures that all involved parties are informed of our achievements, obstacles, and upcoming initiatives. Embracing this practice of openness fosters trust and nurtures a culture of shared responsibility and accountability. All business partners, employees, and associated third parties are also informed of our commitment to the United Nations Global Compact.

- v. Due diligence is centered on our responsibility to cater to and protect human rights while we continuously fight to address any identifiable risk associated with our business portfolio that can hamper or constrain the promotion of human rights. As a Small to Medium Enterprise, we commit to the following:
 - a. Cultivate a business culture that promotes the prevention of corruption and remediation of actual or suspected corrupt activity. Communication is vital and senior management has acknowledged the power of dialogue to spread acceptance of this type of company culture. Any potential conflicts must be identified as soon as practicable and resolved accordingly.

 - b. Focus on an action-oriented approach: Senior management has already partnered with TQF to ensure a pragmatic approach to training and development for its



staff related to the implementation of company policy, bringing it to life at the most important resource level—human resources.

- c. Collaboration is key: We encourage cross-sectorial dialogue towards progress. We applaud our staff who can transfer knowledge across different working groups, corporate entities, and cultures to facilitate the dissemination of critical information regarding the UNGC initiative. In this regard, inter- and intra-company dialogue is encouraged.
- d. Building Trust: no company can progress independently in this globalized era. We encourage our staff to build long-term relationships with trusted partners with whom a relationship can be established. Doing business with like-minded corporate entities will ensure that the UNGC principles are disseminated effectively and that all parties understand and accept our internal standards related to the prevention of corruption. This will eventually allow SMEs to reach a place where there is corporate will to engage on systemic issues challenging progress on critical obstacles to the promotion and protection of human rights.
- e. Freedom to forge pathways to higher standards—While we never want to reinvent the wheel, we understand the importance of unlimited design. The potential for success is exponential, and harnessing growth is critical to revitalizing the industry. When businesses take a stand for human rights and anti-corruption, they are noticed. Implementing inter-company policy via a process of continuous engagement, monitoring, and evaluation at all levels of company governance is essential to its success.



23. ESPY Technical Services Limited is committed to:

- i. Nurturing a company culture that promotes anti-fraud awareness, limiting any opportunity for corrupt or fraudulent activity.
- ii. Maintaining a company policy against bribery or anti-competitive practices.
- iii. Developing systems, processes and procedures to enable a corruption-free environment company-wide.
- iv. Educating staff on suspicious activity, including staff obligations to report actual or suspected cases of the same using internal mechanisms or to external authorities, as required.
- v. Investigating all reports of fraud, corruption, and suspicious practices, ensuring the whistle-blower does not suffer harm or realisation.
- vi. Documenting a robust whistle-blower protection policy and sharing this staff-wide.
- vii. Uphold its obligations under domestic legislation and international custom to safeguard against corporate fraud, bribery or corruption.
- viii. Identifying and implementing best practices based on evaluation results and industry standards.
- ix. Offering training and support to team members to enhance skills and knowledge related to action implementation and evaluation.

24. ESPY Technical Services Limited has a zero-tolerance approach to:

- i. Actual or attempted bribery of public officials.
- ii. Actual or attempted bribery of foreign officials, whether attached to corporate or foreign state bodies.
- iii. Bribery or embezzlement within the private sector.
- iv. Trading in influence.
- v. Abuse of function.
- vi. Illicit enrichment.
- vii. Money laundering and terrorist financing.
- viii. Concealment of laundered assets or proceeds of crime.



- ix. Obstruction of justice or judicial process.
25. Bribery includes all forms of illegitimate expenditures such as kickbacks, extortion, or facilitation payments, as well as legitimate expenditures such as gifts, hospitality, travel payments, entertainment, sponsorship, and charitable contributions.² ESPY Technical Services Limited also takes a zero-tolerance approach to political contributions, corruption, and related activities.
26. ESPY Technical Services Limited's steadfast adherence to this policy underscores our profound conviction regarding the vital role of methodical planning, assiduous execution, and continual assessment. ESPY Technical Services Limited strives to augment our efficacy, foster sustainable triumph, and uphold the utmost performance benchmarks by integrating these precepts into its day-to-day functions.
27. ESPY Technical Services Limited's unwavering dedication to the Anti-Corruption Policy manifests in adherence to the following internal standards:
- i. Maintenance of books and records for the required period per legislation.
 - ii. Retention of all transactions, assets, and liabilities, recorded in original and digital format, and assembled in chronological order for ease of reference.
 - iii. Proper destruction policy governing the destruction of paper-based financial and other records after the expiration of the required period. Digital copies must be retained indefinitely, subject to management's consideration, and must not be altered or otherwise rewritten.

Reporting

28. ESPY Technical Services Limited is committed to the implementation of Reporting Practices that are:
- i. Confidential
 - ii. Free from retaliatory action
 - iii. To an independent auditor and senior management
 - iv. Protects the whistleblower
29. Employees may report actual or suspected corrupt activity to senior management and/or TQF as an external party, in writing. Reports must be made in good faith. Reports will be treated with utmost confidentiality and the identity of the reporter shall be kept

² Transparency International, Business Principles for Countering Bribery: A Multi-Stakeholder Initiative Led by Transparency International, 2013: Transparency International, [131030 Business Principles 2013 31 10 SE2 \(transparencycdn.org\)](https://www.transparencycdn.org/131030-Business-Principles-2013-31-10-SE2)



confidential. Reports that are found to be credible upon initial investigation shall result in the alleged aggressor being questioned by Senior Management and or a representative of TQF as an external partner. All claims will be evaluated by the Cross-Functional Committee whose members shall be notified and commit to maintaining the absolute confidentiality of this process. Where credible reports have been made, and the credibility established by the Cross-Functional Committee, it may result in the aggressor being sanctioned by the Company. The Whistleblower shall also receive an incentive to be determined by the Cross-Functional Committee for engaging in this process.

30. Where the employee whistleblower is fearful of retaliatory action, reports may be made anonymously. All reports made shall be investigated appropriately. Any retaliatory action is severely prohibited. Where an employee feels that he or she has been victimised, we encourage that employee to pursue all action against the company, including pursuing relevant legal avenues available within the jurisdiction of Trinidad and Tobago. ³

Sanctions:

31. ESPY Technical Services Limited is committed to imposing appropriate sanctions where reported violations are found to be legitimate and proven, post-investigation by the Cross-Functional Committee.
32. Sanctions must be:
 - i. Consistent with applicable legislation.
 - ii. Relevant and proportionate.
 - iii. Practically applicable.
 - iv. Effectively controlled.
33. In this regard, situational reactions are prohibited, and sanctions can only be imposed after agreement with Senior Management. The employee will have the opportunity to appeal any sanction imposed, which may include a combination of:
 - i. Disciplinary action (subject to the internal Disciplinary Policy)
 - a. Verbal warning
 - b. First written warning

³ Transparency International, Reporting Guidance on the 10th Principle Against Corruption, 2009: UN Global Compact, [issues_doc/Anti-Corruption/UNGC_AntiCorruptionReporting.pdf](https://www.transparency.org/issues/doc/Anti-Corruption/UNGC_AntiCorruptionReporting.pdf) (d306pr3pise04h.cloudfront.net)



- c. Second written warning
 - ii. Termination of employment
34. Where reporting to the relevant state authority is necessary, the employee may or may not be notified of this decision subject to the instruction of the CEO.

Policy Review and Standards:

35. This policy will be reviewed annually or as needed (if sooner) to ensure its continued relevance and effectiveness. Updates and revisions will be made as necessary to address emerging issues and advancements in sustainability practices.
36. This policy and all sub-policies shall abide insofar as possible by the template set by the **GRI 205: Anti-Corruption Standards**.



Policy Guidance Reference Material:

1. Transparency International, Business Principles for Countering Bribery: A Multi-Stakeholder Initiative Led by Transparency International, 2013: Transparency International, [131030 Business Principles 2013 31_10_SE2 \(transparencycdn.org\)](https://www.transparencycdn.org/131030-Business-Principles-2013-31-10-SE2)
2. Transparency International, Reporting Guidance on the 10th Principle Against Corruption, 2009: UN Global Compact, [issues doc/Anti-Corruption/UNGC AntiCorruptionReporting.pdf \(d306pr3pise04h.cloudfront.net\)](https://www.unglobalcompact.org/issues/doc/Anti-Corruption/UNGC_AntiCorruptionReporting.pdf)
3. United Nations Office on Drugs and Crime: An Anti-Corruption Ethics and Compliance Programme for Business: A Practical Guide, 2013: United Nations, [An Anti-Corruption Ethics and Compliance Programme for Business: A Practical Guide \(unodc.org\)](https://www.unodc.org/publications/An-Anti-Corruption-Ethics-and-Compliance-Programme-for-Business-A-Practical-Guide)
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7. GRI Standards, GRI 205: Anti-corruption 2016. Topic Standard 205. Effective Date: 1 July 2018. GRI: 2024. ISBN 978-90-8866-102-0. [GRI 205 Anti-corruption 2016 \(3\).pdf](https://www.gri.org/standards/gri-205-anti-corruption-2016)



ESPY TECHNICAL SERVICES LIMITED
ANTI-CORRUPTION POLICY
(Including Countering Terrorist Financing and Anti-Money Laundering)

Introduction:

1. ESPY Technical Services Limited has partnered with The Quantum Foundation (TQF), a non-governmental, non-profit company registered in Trinidad and Tobago that promotes the Sustainable Development Goals and the United Nations Global Compact. TQF has provided capacity-building services to ensure that our internal policies and guidelines comply insofar as possible with international standards as they relate to labour rights, anti-corruption, environmental sustainability, and human rights. We have adopted TQF's policy documents and commit to engaging TQF as our partner to monitor and evaluate our compliance with the standards and recommend relevant methods of implementation going forward.
2. ESPY Technical Services Limited is firmly dedicated to implementing the Global Compact and encouraging other private sector entities to follow suit. Our commitment extends to combatting all forms of corruption, encompassing bribery, fraud, and extortion. We are resolute in establishing comprehensive reporting mechanisms, ensuring that whistle-blowers can effectively report suspected and credible instances of corrupt activities within the company and involving external stakeholders.
3. We are committed to upholding all applicable domestic laws that prevent corruption, including the directives established by the Central Bank. We are dedicated to aligning with global best practices in this area to the greatest extent feasible. Recognising the importance of safeguarding our employees and cultivating a culture of zero tolerance for corrupt behaviour, the [United Nations Global Compact Anti-Corruption Principle](#) (Principle 10) acts as our road-map to implementation.

Principle 10-Businesses should work against corruption in all its forms, including gextortion and bribery.



Objectives:

4. This policy aims to establish a framework to prevent, detect, and respond to corruption and bribery within our organisation. It ensures that all business activities are conducted ethically and transparently.

5. ESPY Technical Services Limited is committed to:
 - i. Nurturing a company culture that promotes anti-fraud awareness, limiting any opportunity for corrupt or fraudulent activity.
 - ii. Maintaining a company policy against bribery or anti-competitive practices.
 - iii. Developing systems, processes, and procedures to enable a corruption-free environment company-wide.
 - iv. Educating staff on suspicious activity, including staff obligations to report actual or suspected cases of the same using internal mechanisms or to external authorities, as required.
 - v. Investigating all reports of fraud, corruption, and suspicious practices, ensuring the whistle-blower does not suffer harm or realisation.
 - vi. Documenting a robust whistle-blower protection policy and sharing this staff wide.
 - vii. Uphold its obligations under domestic legislation and international custom to safeguard against corporate fraud, bribery, or corruption.

6. ESPY Technical Services Limited upholds a strict policy of zero tolerance towards corruption. All employees and partners must adhere to the highest standards of honesty and integrity. The involvement in or endorsement of corrupt practices is explicitly forbidden. We expect all staff members to fully embrace and comply with these standards, extending to all our internal and external stakeholders, partners, and clients.



7. ESPY Technical Services Limited is committed to ensuring this policy is communicated to all parties and understood, providing ample opportunity for clarification.

Policy Review:

8. This policy will be reviewed annually to ensure its continued relevance and effectiveness. Updates and revisions will be made to address these issues and advancements in sustainability practices.

Approval and Implementation:

9. This policy has been approved by Criston J. Williams, CEO of ESPY Technical Services Limited and is effective as of August 2024. All employees are expected to adhere to the principles and practices outlined in this policy.



MONITORING AND EVALUATION PROCEDURE

1. ESPY Technical Services Limited falls within the category of Small to Medium Enterprises. Due to the size of the company, resources are finite and are distributed across priority areas stringently. Due to the prioritisation of the United Nations Global Compact Principles, we have dedicated sufficient funding to the monitoring and evaluation of our activities insofar as it relates to our obligations under the United Nations Global Compact. Due to our size, resources are limited, nevertheless, we have implemented several initiatives to ensure sufficient oversight of company activities:
 - i. **Monitoring** serves as a fundamental element of our implementation strategy. ESPY Technical Services Limited utilises established performance metrics and conducts regular reviews to track progress, allowing us to effectively address any challenges and maintain project momentum. This continuous oversight ensures that our actions are in line with our objectives and that any deviations are promptly addressed. Our company is young and still streamlining our activities, having introduced our policy commitments on the Global Compact. The next step is to continue monitoring our policy objectives while assessing this against international best practice.
 - ii. There is increased managerial **oversight** when engaging new partners or third parties, coupled with tailored training for senior management in decision-making positions so that their ability to identify, mitigate, and prevent risks attached to anti-corruption principles is continuously updated. We also require increased due diligence mechanisms when engaging suppliers or making any major investment and review these internal mechanisms periodically through our partnership with TQF to ensure that our risk strategy to minimise our overall risk exposure can stand the test of the international system. Before a third party is engaged, the following is considered:
 - a. Legal status and type of organisation, the jurisdiction of incorporation.
 - b. Assessment of ownership structure, including financial management and affiliated entities.
 - c. Determination of any actual or potential conflict of interest.



- d. Business reputation of intended partner.
 - e. Business partner's internal anti-corruption programme.
 - f. Business partner's willingness to abide by our anti-corruption policy and commitment to the United Nations Global Compact.
- iii. **Evaluation** constitutes an essential component of our unwavering dedication to continual enhancement. ESPY Technical Services Limited meticulously evaluates the abovementioned against predetermined objectives and key performance indicators, as required by the United Nations Practical Guide on Anti-Corruption Ethics and Compliance Programme for Business. This data-centric approach empowers us to make well-informed decisions and refine our strategies to achieve even more superior outcomes in the future. Evaluation is continuous and undertaken by our partner, The Quantum Foundation.
- iv. **Transparency and accountability** are fundamental principles of ESPY Technical Services Limited's policy. The Company provides our stakeholders with regular progress reports and comprehensive final evaluation reports. This ensures that all involved parties are informed of our achievements, obstacles, and upcoming initiatives. Embracing this practice of openness fosters trust and nurtures a culture of shared responsibility and accountability. All business partners, employees, and associated third parties are also informed of our commitment to the United Nations Global Compact.
- v. **Due diligence** is centred on our responsibility to cater to and protect human rights while we continuously fight to address any identifiable risk associated with our business portfolio that can hamper or constrain the promotion of human rights. As a Small to Medium Enterprise, we commit to the following:
- a. Cultivating a business culture that promotes the prevention of corruption and remediation of actual or suspected corrupt activity. Communication is key and senior management has acknowledged the power of dialogue to spread acceptance of this type of company culture. Any potential conflicts must be identified as soon as practicable and resolved accordingly.



- b. Focusing on an action-oriented approach: senior management has already partnered with TQF to ensure a pragmatic approach to training and development for its staff related to the implementation of company policy, bringing it to life at the most important resource level- human resource.
- c. Collaboration is key: we encourage cross-sectorial dialogue towards progress. We applaud our staff that can transfer knowledge across different working groups, corporate entities and cultures to facilitate the dissemination of critical information regarding the UNGC initiative. Inter and intra-company dialogue, in this regard, is encouraged.
- d. Building Trust: no company can progress independently in this globalised era. We encourage our staff to build long-term relationships with trusted partners with whom a relationship can be established. Doing business with like-minded corporate entities will ensure that the UNGC principles are disseminated effectively, and that all parties understand and accept our internal standards as it relates to the prevention of corruption.
- e. This will eventually allow SMEs to reach a place where there is corporate will to engage on systemic issues challenging progress on critical obstacles to the promotion and protection of human rights.
- f. Freedom to forge pathways to higher standards- while we never want to reinvent the wheel, we understand the importance of unlimited design. Potential is exponential to success, and harnessing growth is critical to revitalising the industry. Where business takes a stand for human rights and anti-corruption, it is noticed. Implementing inter-company policy via a process of continuous engagement, monitoring and evaluation at all levels of company governance is essential to its success.

Data Analytics and Peer Review

- 2. ESPY Technical Services Limited wants to lead the implementation of the Global Compact. We have partnered with The Quantum Foundation in this regard.



3. We also rely on quantitative data sets from our partner Quantum Legal, who drafts, reviews, and approves all company contract documents.
4. Billing and data are recorded using the software application Clio in this regard, and automated reports are generated to facilitate monitoring and evaluation of the following:
 - i. Income and expenditure data sets;
 - ii. Time and record keeping;
 - iii. Retention of company and contract documents;
5. This data gained from Clio forms part of our internal reporting mechanism and allows us to adopt a quantitative and independent approach to monitoring and evaluation processes.

RESPONSIBILITY AND POLICY REVIEW

6. The Anti-Bribery Officer is responsible for monitoring the implementation of and reviewing this policy under the oversight of senior management. This Policy is reviewed annually or sooner if required.



ANTI-CORRUPTION TRAINING AND CERTIFICATION PROCESS

1. Given the nature of the field and the need for ESPY Technical Services Limited to engage with the public sector, we require that all Staff undergo some level of financial fair play training, both internally and externally.
2. Internal training shall be for all staff, continuous and implemented by our partner, The Quantum Foundation. Senior Management will be required to complete external training sessions semi-annually with a selected service provider, a cost that the company is fully committed to covering.
3. Training may be in-person or online. Employees shall be allotted the required time to complete said training. As such, employees must inform the company of the expected dates for training at least one month in advance so that appropriate measures can be put in place to account for the absence of the employee.
4. The Company shall keep a record of all training activities, dates, participants and service providers under its retention policy.
5. The Quantum Foundation is responsible for designing and implementing training modules on a periodic basis with staff to ensure that employees are always informed of the latest measures of anti-corruption information.
6. Special focus shall be on informing participants of:
 - i. The latest relevant anti-corruption legislation and any updates or amendments thereto;
 - ii. The latest international standards governing anti-corruption, counter-terrorist financing and anti-money laundering activities that are relevant to our sphere of activities;
 - iii. The company's internal policies on how to detect, report and prevent corruption in the workplace;
 - iv. Guidelines on anti-corruption from the T&T Central Bank or other similar sources.
 - v. External service providers shall be selected via a competitive process. The rationale and method of selection shall be recorded by the company as part of its records.
 - vi. External service providers must abide by the United Nations Global Compact and be willing to accept the company's policy on Anti-corruption.



ANTI-BRIBERY REPORTING PROCEDURE

1. ESPY Technical Services Limited's steadfast adherence to this Bribery Reporting Procedure underscores our profound conviction regarding the vital role of methodical planning, assiduous execution, and continual assessment. By integrating these precepts into its day-to-day functions, ESPY Technical Services Limited strives to augment its efficacy, foster sustainable triumph, and uphold the utmost performance benchmarks.
2. ESPY Technical Services Limited has a zero-tolerance approach to:
 - i. Actual or attempted bribery of public officials;
 - ii. Actual or attempted bribery of foreign officials, whether attached to corporate or foreign state bodies;
 - iii. Bribery or embezzlement within the private sector;
 - iv. Trading in influence;
 - v. Abuse of function;
 - vi. Illicit enrichment;
 - vii. Money-laundering and terrorist financing;
 - viii. Concealment of laundered assets or proceeds of crime;
 - ix. Obstruction of justice or judicial process.

BRIBERY AND CONFLICT OF INTEREST

3. Bribery includes all forms of illegitimate expenditures, such as kickbacks, extortion or facilitation payments, and legitimate expenditures, such as gifts, hospitality, travel payments, entertainment, sponsorship, and charitable contributions. ESPY Technical Services Limited also takes a zero-tolerance approach to political contributions, corruption and related activities. Where a conflict of interest occurs or is suspected to occur, a disclosure must be made immediately and pursuant to the Senior Manager or General Counsel, and the conflict must be resolved. Resolution of conflict shall follow the following process:
 - i. Identification of conflict or potential conflict
 - ii. Disclosure to Senior Management
 - iii. Review by Senior Management, including investigation, impact/risk assessment and determination of mitigation efforts
 - iv. Relay of informed decision to affected parties.
4. Where a conflict is deemed to have been determined, and irreparable, the employee, business partner, or related party shall be informed and invited to provide a solution, as



well as be provided with a series of possible options and their impact assessments. With the approval of Senior Management, the employee must then determine the most appropriate way forward based on the options available to him or her. Where no resolution can be identified, and the employee fails to adhere to company directive, disciplinary action may be pursued. The employee is also encouraged to assess their options pursuant to the laws of Trinidad and Tobago.

REPORTING FORMAT

5. The appointed Anti-Bribery Officer is the General Counsel of The Quantum Foundation under whose purview any report of bribery or corrupt activities falls, however any member of Senior Management may take a report of bribery or corrupt activities and refer it to the Anti-Bribery Officer. As a third-party representative, the General Counsel is bound to act independently and in the best interest of the company, holding a fiduciary duty to same.
6. ESPY Technical Services Limited is committed to the implementation of Reporting Practices that are:
 - i. Confidential
 - ii. Free from retaliatory action
 - iii. To an independent auditor and senior management
 - iv. Protects the whistleblower
7. Employees may report actual or suspected corrupt activity to senior management and/or the Anti-Bribery Officer as an external party, in writing. Reports will be treated with utmost confidentiality and the identity of the reporter shall be kept confidential. Reports that are found to be credible upon initial investigation shall result in the alleged aggressor being questioned by Senior Management and or a representative of TQF as an external partner. All claims will be evaluated by the Cross-Functional Committee whose members shall be notified and commit to maintaining the absolute confidentiality of this process. Where credible reports have been made, and the credibility verified by the Cross-Functional Committee, it may result in the aggressor being sanctioned by the Company. The Whistleblower shall also receive an incentive to be determined by the Cross-Functional Committee for engaging this process.
8. Where the employee whistleblower is fearful of retaliatory action, reports may be made anonymously, in writing. All reports made shall be investigated appropriately. Any retaliatory action is severely prohibited. Where an employee feels that he or she has



been victimised, we encourage that employee to pursue all action against the company, including pursuing relevant legal avenues available within the jurisdiction of Trinidad and Tobago.

SANCTIONS FOR UNSCRUPULOUS REPORTING

9. ESPY Technical Services Limited is committed to imposing appropriate sanctions where reports are unscrupulously made, and it is determined by the Cross-Functional Committee that there was no basis for said allegation being made. ESPY Technical Services Limited is committed to protecting all employees and will impose the appropriate sanction for illegitimate reporting.
10. Sanctions must be:
 - i. Consistent with applicable legislation;
 - ii. Relevant and proportionate;
 - iii. Practically applicable;
 - iv. Effectively controlled;
11. In this regard, situational reactions are prohibited and sanction can only be imposed after agreement with Senior Management. The employee will have the opportunity to appeal any sanction imposed, which may include a combination of:
 - i. Disciplinary action (subject to the internal Disciplinary Policy)
 - a. Verbal warning
 - b. First written warning
 - c. Second written warning
 - ii. Termination of employment
 - iii. Where reporting to the relevant state authority is necessary, the employee may or may not be notified of this decision subject to the instruction of the CEO.

POLICY REVIEW

12. This policy will be reviewed annually or as needed (if sooner) to ensure its continued relevance and effectiveness. Updates and revisions will be made as necessary to address emerging issues and advancements in sustainability practices.

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COLLECTIVE ACTION AGAINST CORRUPTION

1. ESPY Technical Services Limited vows to uphold the Principles of the United Nations Global Compact, particularly its Principle 10 that:

“Businesses should work against corruption in all its forms, including extortion and bribery.”

2. The private sector must take an active role in the fight against corruption. This course of action must be proactive and solution-based. Public-private partnership in the fight against corruption is key. We are committed to enhancing our zero-tolerance approach to corruption through our Anti-Corruption Policy with this procedural document on Collective Action Against Corruption. The following activities will be pursued:
 - i. Facilitation of dialogue between public and private sectors to foster a think-tank for all stakeholders to discuss and implement practical guidance against corruption and similar activity.
 - ii. Foster an environment of collaboration to promote ethical business performance models and manuals;
 - iii. Encourage capacity building and knowledge transfer across sectors for methods to promote transparency in business;
 - iv. Educate the public on the Global Compact Local Networks and commit to encouraging more participation in same within the Caribbean Region, and eventually expanding to the wider Latin American and Caribbean (LAC) Region.

Procedure:

3. ESPY Technical Services Limited shall publish periodic anti-corruption declarations on its website and on all contract documents going forward.
4. Ensure that staff and associates are educated and trained regularly in methods of detecting, reporting and preventing corruption and related activities. This is critical to building a company culture against corruption and raising awareness to build capacity in same. Please refer to the Education and Training Policy for additional guidance.
5. Encouraging all employees (where permissible) to join the United Nations Global Compact Academy and participate in relevant training sessions available to both members and non-members of the Academy.



6. Allocate necessary resources to bolster internal policy and procedure governing anti-corruption activities, monitoring and evaluation. Adopt reasonable reporting standards in line with international best practice and the United Nations mandate. This allocation of resources must be reasonable given the economic climate of the company and must be identified as an actual expenditure in the company's annual budget.
7. Develop at least one Principle Based Initiative tackling an issue related to the thematic area of the fight against corruption annually and monitor the implementation of same. This Initiative shall form part of the annual reporting mechanism as part of the results-based approach of the company's monitoring and evaluation policy.
8. Certifying Business Coalition- all contracts shall include reference to the United Nations Global Compact and the Sustainable Development Goals, noting our commitment to same. Our business partners will be required to acknowledge same in doing business with ESPY Technical Services Limited.
9. Comply with all domestic legislation governing the prevention of corruption and all applicable international conventions insofar as possible.
10. Draft and implement an appropriate Collective Action Framework using the *United Nations Global Compact Uniting Against Corruption: A Playbook on Anti-Corruption Collective Action (2021)* as guidance. This Framework shall be reviewed annually and undergo continuous monitoring and evaluation to sufficiently gauge its impact.



COMPLIANCE AND MONITORING PROCEDURE

1. ESPY Technical Services Limited is proactive in maintaining a robust compliance and monitoring system company-wide. We understand that this is a necessary process to ensure that the organisation is implementing its internal regulations to help mitigate risks associated with corruption or the perception thereof within the business. We require accountability to enhance efficiency and ensure effectiveness in the international market.

Internal Monitoring

2. Internal Monitoring is set out in our Anti-Corruption Policy. ESPY Technical Services Limited has implemented a rigorous risk assessment, mitigation and due diligence process as identified within the Anti-Corruption Policy. The Quantum Foundation acts as our partner to monitor implementation of same, and evaluate its effectiveness to the business environment. A vigorous data collection process shall be undertaken in the form of:
 - i. Questionnaires disseminated to all stakeholders of the company to measure perceptions of the anti-corruption policy;
 - ii. Qualitative analysis of international best practice;
 - iii. Peer review and comparison of similar businesses in the market.
3. Additionally, we engage in self-monitoring to ensure that required processes are implemented company-wide. All employees are expected to implement self-checks to promote accountability and transparency in the workplace. Employees must complete and abide by stipulated rules and regulations governing the completion of purchase orders, tenders, requests for quotations, and other aspects of the competitive procurement process. These standards are based on legislation and subject to the oversight of the Office of the Procurement Regulator, under the Office of Procurement Regulation, the authority in Trinidad and Tobago governing public procurement, regulation and practices.

External Audits

4. ESPY Technical Services Limited is committed to transparency. We engage a third-party service provider to undertake an extensive financial audit annually. This is to ensure that our operations are transparent and to mitigate any risk of corrupt activity. The service provider is selected based on a competitive procurement process and the



needs of the company at that time. The scope of the audit may be expanded or narrowed as necessary; however, reasons for change in scope must be identified and circulated to senior management and the Anti-Bribery Officer.

5. Similarly, ESPY Technical Services Limited shall also engage an external auditor to review its Programmes and Policies after the completion of a three-year cycle, or sooner if necessary. A three-year cycle has been selected considering the company's nature and the financial cost attached to this exercise.

Assessment of Stakeholders

6. Stakeholders shall include the following: employees, business partners, affiliated entities and service providers. Stakeholders shall be assessed against the following criteria:
 - i. *Skills*
 - ii. *Services provided*
 - iii. *Policy compliance*
 - iv. *Risk*
7. Reporting shall be confidential and shall form part of the employee Performance Appraisal, which shall be conducted annually. For external stakeholders, partner reports shall govern the lifecycle of any business relationship. The results in this regard shall determine whether the relationship shall continue.

Peer-Review and Analysis

8. Given the recent COVID-19 pandemic, the healthcare and medical research industry is quite robust in Trinidad and Tobago and the region. As such, ESPY Technical Services Limited will promote its competitive advantage over other companies via a robust peer review and comparison with like-minded ventures within the industry.



WHISTLEBLOWER POLICY AND PROCEDURE

1. ESPY Technical Services Limited promotes the prevention of corruption and swift reporting of any actual or suspected instances of corruption. We are committed to protecting the identity of the whistleblower, renouncing any instance of retaliatory action and protecting the disclosures made to the company. Our Whistleblower Policy is as follows:

Policy Outline

2. This policy is designed to outline the process and procedures associated with disclosures made during the Whistleblowing Process. It is intended to be tangible support of our company values to ensure that all stakeholders are assured of their right to raise any concern of misconduct without suffering retaliation.

Coverage

3. This Policy is intended to cover the following allegations of:
 - i. Corruption and related offences;
 - ii. Fraud;
 - iii. Corporate criminal offences;
 - iv. Compliance failures;
 - v. Concealment;
 - vi. Conflicts of Interest;
 - vii. Infringement of any legislation by the company or corporate officials in the name of the company.

Promise

4. All reports made in good faith shall be treated fairly and confidentially. Retaliation for the disclosures made or victimisation shall be strictly prohibited. Disclosures must be made in writing. Any disclosure made shall be treated as a protected disclosure. Staff shall be informed of the existence of a disclosure, the parties appointed to investigate same and a timeframe for completion of the investigation. Staff shall also be informed of the general findings of the investigation when it has been completed, that is whether the disclosure has been proven or disproven. All personal information included in the disclosure shall be redacted when reported to staff.



Reporting

5. Any company stakeholder or external actor with due cause can report unscrupulous or corrupt activity, whether actual or suspected, to the Anti-Bribery Officer, currently identified as the General Counsel of The Quantum Foundation. Alternatively, reports can be made to any member of senior management who is obligated to forward said report to the Anti-Bribery Officer. Any and all reports must be made in good faith and with no malicious intent to harm the personal character of the alleged perpetrator.

Timeframe for Reporting

6. All reports if made to any other party than the Anti-Bribery Officer, must be forwarded to same within twenty-four hours of receipt. The Anti-Bribery Officer must then begin investigating the allegation/s made within forty-eight hours of receipt of same.
7. The Investigation Period shall be no more than two weeks long and shall involve all relevant parties per issue reported. The Investigative Panel shall be led by the Anti-Bribery Officer and include one representative of senior management and one additional third-party representative who shall be an expert in the identified field.
8. Where allegations are made against either senior management or the Anti-Bribery Officer, any investigation shall be conclusively handled by an appointed third party to ensure the independence of the investigative process. The company shall bear this cost in the first instance, and if wrongdoing is sufficiently proven, it may be recovered from the aggressor.

Public Interest

9. The company shall report any findings of criminal conduct to the appropriate authorities. Where applicable, a whistleblower who makes a protected disclosure in good faith and pursuant to company policy and the **Whistleblower Protection Act No. 9 of 2024** pursuant to the laws of the Republic of Trinidad and Tobago, shall not be liable to any criminal, civil or disciplinary proceedings for having made said disclosure. Where the Whistleblower was part of the alleged offence, this protection shall not apply.

