

ANTI-CORRUPTION POLICY

Purpose

The purpose of this Anti-Corruption Policy is to establish 17 ASUS Resources Ltd.'s commitment to maintaining the highest standards of integrity and transparency in all business activities. This policy aims to prevent and address corruption, bribery, and unethical practices, ensuring compliance with applicable laws and regulations, including those enforced by the Economic and Financial Crimes Commission (EFCC).

Scope

This policy applies to all employees, contractors, vendors, and business partners of 17 ASUS Resources Ltd. It covers all aspects of our operations across all sectors, including oil and gas, aviation, construction, logistics, electrification, medical supplies, and asset management.

Core Principles

1. Commitment to Integrity

- 17 ASUS Resources Ltd. is committed to conducting business ethically and transparently, upholding the highest standards of integrity in all interactions with clients, suppliers, and other stakeholders.
- We strictly prohibit any form of bribery, corruption, or unethical conduct, and we expect all employees and partners to adhere to these standards.

2. Compliance with Laws and Regulations

- We comply with all applicable anti-corruption laws, including the Corrupt Practices and Other Related Offences Act, the Money Laundering (Prohibition) Act, and other relevant regulations enforced by the EFCC and other regulatory bodies.
- Our policy aligns with the guidelines set forth by the Federal Competition and Consumer Protection Commission (FCCPC) and any other relevant regulatory authorities.

3. Preventive Measures

- **Risk Assessment:** Regularly conduct risk assessments to identify and mitigate potential corruption risks within our operations.
- **Training and Awareness:** Provide regular training to employees and partners on anti-corruption laws, ethical conduct, and reporting procedures.
- **Internal Controls:** Implement robust internal controls to detect and prevent bribery and corruption. This includes financial controls, approval processes, and monitoring mechanisms.

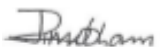
4. Reporting and Investigation

- **Reporting Mechanisms:** Establish confidential reporting channels for employees and stakeholders to report suspected corruption or unethical conduct without fear of retaliation.
 - **Investigation:** Investigate all reported incidents of corruption or unethical behavior thoroughly and impartially. Take appropriate corrective and disciplinary actions based on the findings.
5. **Record Keeping and Transparency**
- Maintain accurate and transparent records of all transactions, financial dealings, and interactions with third parties to ensure accountability and traceability.
 - Provide clear documentation to demonstrate compliance with anti-corruption laws and internal policies.
6. **Enforcement and Accountability**
- **Management Responsibility:** Senior management is responsible for enforcing this policy, ensuring that it is communicated and implemented throughout the organization.
 - **Employee Responsibility:** Every employee is responsible for understanding and adhering to this policy, reporting any concerns or violations, and cooperating with investigations.
7. **Continuous Improvement**
- Regularly review and update this policy to ensure its effectiveness and alignment with changes in laws and regulations.
 - Seek feedback from employees and stakeholders to improve our anti-corruption practices and address emerging risks.
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Conclusion

At 17 ASUS Resources Ltd., we are dedicated to maintaining a culture of integrity and ethical conduct in all our business dealings. Through the implementation of this Anti-Corruption Policy, we aim to uphold our commitment to compliance with anti-corruption laws and promote transparency and accountability across all sectors.

This policy will be reviewed periodically to ensure its continued relevance and effectiveness in preventing corruption and unethical practices.



Zuberu Jimoh
Managing Director