



CSR Policy - Money Laundering, Corruption, and Child Labor

Wichmann Systems Ltd. confirms our commitment to conduct our operations in East Africa in accordance with the highest ethical standards and in compliance with applicable laws and regulations regarding corporate social responsibility (CSR). We are particularly focused on combating money laundering, corruption, and child labor. Our goal is to contribute positively to society, maintain integrity, and promote sustainable development.

Anti-Corruption and Combating Money Laundering

- Principle 1: Combating money laundering.
- Principle 2: We work against corruption in all our activities in East Africa

Combating Child Labor

- Principle 1: We are deeply committed to combating child labor and ensuring that our activities in East Africa do not involve or contribute to child labor.

CSR Policy – Awareness and Compliance Among Employees

- Principle 1: All employees are expected to be familiar with our CSR policy specifically for East Africa.
- Principle 2: Awareness among employees of suspicious activities related to money laundering, corruption, or child labor.
- Principle 3: We ensure that all employees receive appropriate training and updates on our CSR policy.
- Principle 4: All employees must sign the appendix in the employment contract.





Anti-Corruption and Combating Money Laundering

- Principle 1: Combating money laundering.
- Principle 2: We work against corruption in all our activities in East Africa

1. Money Laundering:

We commit to combating money laundering in all our activities in East Africa. We adhere to all applicable laws and regulations related to money laundering, including the Money Laundering Act and Anti-Money Laundering (AML) measures. We conduct regular risk assessments and take appropriate measures to prevent and detect any form of suspicious activity, reporting it to the relevant authorities.

2. Corruption:

We condemn corruption in all its forms and are committed to maintaining a corruption-free environment in our activities in East Africa. We comply with all applicable anti-corruption laws and regulations, including the Anti-Corruption and Economic Crimes Act. We do not tolerate bribery, extortion, or any form of undue influence. All our employees and business partners are expected to act in accordance with our policy and report any suspicion of corruption.





Combatting Child Labor

- Principle 1: We are deeply committed to combating child labor and ensuring that our activities in East Africa do not involve or contribute to child labor.

1. Child Labor:

We are deeply committed to combating child labor and ensuring that our activities in East Africa do not involve or contribute to child labor. We adhere to all applicable laws and regulations concerning the protection of children and the elimination of child labor, in accordance with ILO conventions and national legislation. We collaborate with our suppliers and business partners to ensure they also comply with our policy against child labor. Any suspicion of child labor must be promptly reported and handled in accordance with applicable laws and our internal procedures.

We commit to continuously improving our CSR practices, monitoring compliance with this policy, and openly reporting on our progress.



CSR Policy – Expectations for Employees and Signing of Appendix in Employment Contracts

- Principle 1: All employees are expected to be familiar with our CSR policy.
- Principle 2: Awareness among employees of suspicious activities related to money laundering, corruption, or child labor.
- Principle 3: We ensure that all employees receive appropriate training and updates on our CSR policy.
- Principle 4: All employees must sign the appendix in the employment contract.

To strengthen our commitment to CSR and ensure a complete understanding and compliance with our policy against money laundering, corruption, and child labor in our activities in East Africa, we have the following expectations for our employees:

Familiarity with and compliance with the policy:

All employees are expected to be familiar with our CSR policy specifically for East Africa, including the sections on money laundering, corruption, and child labor. It is important that all employees understand and comply with the guidelines and procedures outlined in the policy.

Reporting of suspicious activity:

We encourage all employees to be vigilant and report any suspicious activity related to money laundering, corruption, or child labor. Suspicions or concerns can be reported to relevant internal channels or through our whistleblower scheme, ensuring confidentiality and protection against potential reprisals.

Training and updates:

We will ensure that all employees receive appropriate training and updates on our CSR policy, including specific training programs on handling money laundering, corruption, and child labor. This will contribute to raising awareness and ensuring that our employees are able to identify and prevent such activities.

Signing of appendix in employment contracts:

All employment contracts with Wichmann Systems Ltd. (formerly Domino Systems A/S) related to employment in East Africa must include this appendix - "Anti-Corruption Policy - Specifically for East Africa." By signing the contract, the employee confirms that they have read, understood, and accepted to comply with the policy and the obligations described in the appendix.