



Multimodal Global Logistics Limited (MGL)

ANTI-BRIBERY COMPLIANCE POLICY

OF

**MULTIMODAL GLOBAL LOGISTICS
LIMITED**

BAKU, AZERBAIJAN

01.01.2016



Multimodal Global Logistics Limited (MGL)

ANTI BRIBERY COMPLIANCE POLICY/PROCEDURES/CODE OF CONDUCT

Anti- Bribery Compliance Policy: Multimodal Global Logistics Limited (MGL) its employees, managers, all affiliates worldwide, and including all approved agents, shall comply in all respects with the requirements of the Anti-Bribery Corrupt Practices Act.

Anti-bribery compliance procedures and training programs are in place at all MGL's facilities, including assigned Compliance Officers. All relevant employees are fully trained to understand the law, and are trained to spot "red flags" which sometimes signal high risk activity, and trained to promote internal due diligence across all affiliates in order to remain at the ready for questioning possible violations, reporting violations, and being prepared for any audits, which can be required by Clients, and or Government Agencies. It is a required part of our training to insure transparent costs accounting, with billing line items adequately backed up by receipts and or other authorized expenditures. Two basic and important areas of our Anti-bribery compliance programs are (a) Preventing and detecting violations of the law and (b) Demonstrating a commitment to lawful and ethical business practices worldwide.

Enforcement of the Anti-Bribery Practices Act has reached historically high numbers, and we are fully aware of the corporate and personal liabilities involved concerning non-compliance with not only our own company and personnel, but that of our Clients as well. The existence of a clear and audited corporate compliance program is essential to maintaining our business. Our compliance program takes into account not only U.S. & UK laws, but also Azerbaijan including those laws of the various countries where we or our Clients operate. Likewise, certain countries have their own anti-corruption policies that we are aware of and we stay in compliance via research and training, and such laws are always considered into the drafting of our own compliance programs.

Multimodal Global Logistics Limited does not employ or compensate any government officials worldwide. Nor are any of MGL's owners, officers, and or managers, government officials of any country. This also pertains to any contractors, agents, or representatives MGL works with worldwide.



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MGL`s Anti-Bribery Compliance Programs are formulated by the following basic components:

Corporate Anti-Bribery Compliance Policy: Detailed above

Internal Communications and Educational Material: Anti-Bribery Training has been implemented across Multimodal Global Logistics Limited and MGL's affiliates & subcontractors in country whereby relevant employees are trained on Anti-Bribery (And to similar to FCPA) compliance and international business scenarios detailing certain situations indicative of possible or certain compliance violations, and also practical advice on avoiding non- compliance exposure. Similar in respect to "safety meetings" Multimodal Global Logistics Limited(MGL) has informal Anti-Bribery/FCPA compliance meetings between relevant personnel and departments where any recent and or possible "Compliance Red Flags" are discussed and addressed, any recent DOJ enforcement actions in any areas where we operate (or not) are discussed, and further reinforcing the importance of full compliance as related to ours ,and our Client Company's best interests.

Practical Procedures and Guidance: Educational downloads offer our employee's certain real world situations whereby non-compliance could or would be an issue. This continued training, along with open communications with our affiliates continually guides our employees and Agents toward FCPA compliance.

Regular Compliance Review: Steps being taken in our regular FCPA compliance reviews are, (a) Continuing to review FCPA policies and procedures; (b) Keeping and revising a list of individuals in sensitive positions for whom the FCPA is likely to be of particular relevance; (c) Interviewing and or obtaining written certifications from individuals in sensitive positions; (d) Ensuring that individuals in these sensitive positions (and others) do not have a history documented violating the law and or company policies; (e) Reviewing company's FCPA compliance with procedures that dictate relevant business transactions; (f) Assessing and altering if needed, the sufficiency of employee training.



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Written Certification by Relevant Employees and foreign Affiliates/

Representatives: Relevant employees, worldwide, are required to certify in writing that they have been advised and are in compliance with our Anti-Bribery/ FCPA compliance policies. Foreign agents are also required to certify in writing their compliance to our Anti-Bribery/FCPA compliance policies. Any contracts entered into with any foreign agent or representative, must and does include verbiage blinding the contract validity to transparent accounting and strict adherence to compliance with Anti-Bribery/FCPA and our Anti-Bribery policies.

Reporting Mechanism for Violations: Employees are encouraged to report any violations to FCPA policy to their managers and compliance officer. These reports may be submitted anonymously in letter or email forms, or verbally. Investigations will be initiated, and actions taken if confirmed a violation has taken place, and appropriate further self-reporting of a violation to UK Foreign Office and Azerbaijan Prosecution office.

Code of Conduct: Except as expressly provided in the Policy, no payment or gift of any kind whatsoever may be promised, offered or made to any public official (regardless of rank) or any person in order to improperly influence that person to secure any advantage for the Company and or its clients.

Notwithstanding the foregoing, entertainment, meals, company promotional items, gifts of a nominal value and other business courtesies may not be offered to any public official except in accordance with the Policy and unless the Company's Management has provided prior, written approval in this regard.

To obtain approval, an application must be made to the Human Resource Department detailing what the hospitality is required for and its justification. The Human Resource Manager, upon consultation with the President and or the Director of Business Development, shall communicate a decision which shall be a final.

At no time should any hospitality be offered or provided in return for any favor or benefit to the Company and or its clients or to influence any official decision.

Complete and accurate records sufficient to show compliance with the above rules must be maintained at all times.



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False or misleading entries are not to be made in the Company's books and records for any reason.

Any transaction, no matter how seemingly insignificant, that might reasonably be expected to give rise to a violation of the Anti-Bribery / & Foreign Corrupt Practices Act, Anti-Bribery/ FCPA, and any other Company policies must promptly be reported to the Company's President and or the Compliance Officer, or if the employee so desires, such report may be made through the Company's Human Resources Manager. All such reports will be treated as confidential, to be used only for the purpose of addressing the specific problem they address. Such reports will be shared by the President and or Compliance Officer and other authorized individuals only on a need-to-know basis. As long as a report is made honestly and in good faith, the Company will take no adverse action against any person based on the making of such a report. Employees must note, however, that failure to report known or suspected wrongdoing of which an employee has knowledge may, by itself subject that employee to disciplinary action.

Any person who has any questions about this Policy or about a specific transaction should obtain guidance from Company Managers and or through the Anti-Bribery Compliance Officer. However, the ultimate responsibility for adhering to this Policy and avoiding improper transactions rests with each employee. The Company will expect the strictest compliance with these procedures by all employees at every level inclusive of every consultant, director or agent. Failure to observe them would be considered a material breach of the Company's policies and may lead to the termination of employment, contract of service, consultancy or agency of the relevant personnel, consultant, director or agent.