I. Introduction

Express International Group (EIG) takes a zero-tolerance approach to bribery and corruption and we are committed to conducting our business in an honest and ethical manner. We have adopted this policy to communicate this message and to assist those working for us to uphold it.

II. Purpose

To establish controls to ensure compliance with all applicable anti-bribery and corruption regulations, and to ensure that the Company's business is conducted in a socially responsible manner.

III. Scope

In this policy, third party means any individual or organization you come into contact with. During the course of your work at EIG, and includes actual, potential clients, customers, suppliers, distributors, business contacts, agents, advisers, government and public bodies, including their advisors, representatives and officials, politicians and political parties. This policy applies to all individuals working at all levels and grades, including senior managers, officers, directors, employees (whether permanent, fixed-term or temporary), consultants, contractors, trainees, seconded staff, casual workers, interns, agents, sponsors, or any other person associated with EIG or any of its subsidiaries or their employees, wherever located.

This policy covers:

a. Bribes
b. Gifts and hospitality
c. Facilitation payments
d. Political contributions
e. Charitable contributions

a. Bribes

Employees must not accept any gift or hospitality from a third party unless approved in writing by the President.

b. Facilitation Payments

Facilitation payments and Kickbacks are a form of bribery made for the purpose of expediting or facilitating the performance of a public official for a routine governmental action, and not to obtain or retain business or any improper business advantage. Facilitation payments tend to be demanded by low level officials to obtain a level of service which one would normally be entitled to. Our strict policy is that facilitation payments must not be paid. We recognize, however, that our employees may be faced with situations where there is a risk to the personal security of an employee or his/her family and where a facilitation payment is inevitable, in which case, the following steps must be taken:

- Keep any amount to the minimum
- Create a record concerning the payment
- Report it to your line manager

In order to achieve our aim of not making any facilitation payments, each business of the Company shall keep a record of all payments made, which must be reviewed by Financial Manager in order to evaluate the business risk and to develop a strategy to minimize such payments in the future.

c. Political Contributions

We do not make donations, whether in cash or any kind, in support of any political parties or candidates, as this can be perceived as an attempt to gain an improper business advantage.

d. Charitable Contributions

Charitable support and donations are acceptable (and indeed are encouraged), whether of in-kind services, knowledge, time, or direct financial contributions. However, employees must be careful to ensure that charitable contributions are not used as a scheme to conceal bribery. We only make charitable donations that are legal and ethical

under local laws and practices. No donation shall be offered or made without the prior approval of the President and the Compliance Manager. All charitable contributions should be publicly disclosed.

IV. Employee Responsibility

Any employee must ensure that he read, understand and comply with this policy. The prevention, detection and reporting of bribery and other forms of corruption are the responsibility of all those working for EIG or under our control. All employees are required to avoid any activity that might lead to, or suggest, a breach of this policy. Employee must notify line manager or the President as soon as possible, if he/she believes or suspects that a conflict with or breach of this policy has occurred, or may occur in the future. Any employee who breaches this policy will face disciplinary action, which could result in dismissal for gross misconduct. EIG reserves its right to terminate contractual relationship with other workers if they breach this policy

V. Record-Keeping

We must keep financial records and have appropriate internal controls in place which will evidence the business reason for making payments to third parties. Involved departments must declare and keep a written record of all hospitality or gifts accepted or offered, which will be subject to managerial review. All department employees must ensure all expenses claims relating to hospitality, gifts or expenses incurred to third parties are submitted in accordance with our expenses policy and specifically record the reason for the expenditure.

All accounts, invoices, memoranda and other documents and records relating to dealings with third parties, such as clients, suppliers and business contacts, should be prepared and maintained with strict accuracy and completeness. No accounts must be kept "off-book" to facilitate or conceal improper payments.

VI. Protection

Employees who refuse to accept or offer a bribe, or those who raise concerns or report another's wrongdoing, are sometimes worried about possible repercussions. EIG aims to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of refusing to take part in bribery or corruption, or because of reporting in good faith their suspicion that an actual or potential bribery or other corruption offence has taken place, or may take place in the future. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavorable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the Compliance Manager immediately. If the matter is not remedied, and you are an employee, you should raise it formally to the President.

VII. Training And Communication

Training on this policy forms part of the induction process for all new employees. All existing employees shall receive regular, relevant training on how to implement and adhere to this policy. In addition, all employees shall be asked to formally accept conformance to this policy on an annual basis. Our zero-tolerance approach to bribery and corruption must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and as appropriate thereafter.

The policy is communicated to all our stakeholders including but not limited to: employees, agents, clients and suppliers.

VIII. Responsibility

The Top Management has overall responsibility for ensuring this policy complies with EIG legal and ethical obligations and that all those under our control comply with it. The Director of Operations has primary and day-to-day responsibility for implementing this policy, and for monitoring its use and effectiveness and dealing with any queries on its interpretation. Management at all levels are responsible for ensuring those reporting to

them are made aware of and understand this policy and are given adequate and regular training on it.

IX. Monitoring And Review

The Director of Operations shall monitor the effectiveness and review the implementation of this policy, regularly considering its suitability, adequacy and effectiveness. Any improvements identified shall be made as soon as possible. Internal control systems and procedures shall be subject to regular audits to provide assurance that they are effective in countering bribery and corruption. All employees are responsible for the success of this policy and should ensure they use it to disclose any suspected danger or wrongdoing. Employees are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries should be addressed to the Human Resources Manager. This policy does not form part of any employee's contract of employment and it may be amended at any time.

Approved by:

Jerry Nazzal
Group President