

TOKYO (K) SERVICES LIMITED

📍 Kenyatta Street, Santuri Court, 2nd Floor

☎ +254-722-647-101

✉ tokyokservices@gmail.com



P.O Box 8710-30100

Eldoret, Kenya

www.tokyogroupkenya.com

ANTI-CORRUPTION AND ANTI-BRIBERY POLICY

Policy Reference	TKS-ACAB-005
Effective Date	31 st January 2026
Review Cycle	Annual
Version	1.0
Approved By	Managing Director

1. POLICY STATEMENT

Tokyo (K) Services Limited is committed to upholding high standards of safety, professionalism, and operational discipline across all its activities. The Company recognizes that effective health and safety management is critical within the petroleum logistics sector, where operational risks must be proactively identified and responsibly managed.

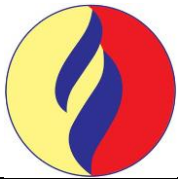
Accordingly, the Company shall take reasonable and appropriate measures to establish and maintain safety procedures, risk controls, and awareness practices that support the prevention of workplace incidents and promote the well-being of employees and other stakeholders. These measures shall be aligned with applicable legal and regulatory requirements, as well as recognized industry practices.

The Company remains committed to the continuous improvement of its safety systems and practices, with the objective of maintaining a responsible, compliant, and safety-conscious working environment.

2. PURPOSE OF THE POLICY

This Policy is designed to:

- Prevent acts of bribery, corruption, and unethical conduct.
- Promote a culture of integrity, accountability, and responsible business practice.
- Ensure compliance with all applicable anti-corruption laws and regulatory requirements.
- Safeguard the Company's reputation and stakeholder trust.
- Provide clear mechanisms for identifying and reporting suspected misconduct.



TOKYO (K) SERVICES LIMITED

📍 Kenyatta Street, Santuri Court, 2nd Floor

☎ +254-722-647-101

✉ tokyokservices@gmail.com



P.O Box 8710-30100

Eldoret, Kenya



www.tokyogroupkenya.com

3. SCOPE

This Policy applies to:

- Directors and senior management
- All employees
- Contractors and consultants
- Agents and intermediaries
- Suppliers and service providers
- Business partners acting on behalf of the Company

It covers all business activities undertaken within Kenya and in any other jurisdiction where the Company operates.

4. DEFINITION OF CORRUPTION

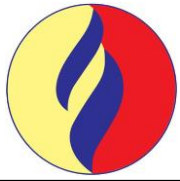
Corruption is defined as the misuse of entrusted authority for personal or organizational gain.

This includes, but is not limited to:

- Bribery
- Kickbacks
- Fraudulent practices
- Facilitation payments
- Embezzlement
- Conflicts of interest
- Improper gifts, hospitality, or inducements

5. BRIBERY

Bribery involves offering, promising, giving, requesting, or receiving anything of value with the intention of influencing a decision or securing an improper advantage.



TOKYO (K) SERVICES LIMITED

📍 Kenyatta Street, Santuri Court, 2nd Floor

☎ +254-722-647-101

✉ tokyokservices@gmail.com

📦 P.O Box 8710-30100
Eldoret, Kenya

🌐 www.tokyogroupkenya.com

Personnel and representatives of Tokyo Kenya Services Limited are strictly prohibited from:

- Offering or giving inducements to government officials or regulators.
- Soliciting or accepting benefits from suppliers, contractors, or third parties.
- Providing payments or incentives to influence regulatory or commercial decisions.
- Making facilitation payments to expedite services or approvals.

6. GIFTS, HOSPITALITY, AND ENTERTAINMENT

Reasonable and legitimate business hospitality may be acceptable where it:

- Is modest, proportionate, and appropriate to the business context
- Is not intended to improperly influence any decision
- Complies with internal procedures and approval requirements
- Is accurately recorded and transparent

Under no circumstances should gifts or hospitality be used to obtain an unfair advantage or compromise professional judgment.

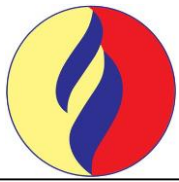
7. CONFLICT OF INTEREST

All personnel are expected to avoid situations where personal interests could conflict with those of the Company.

Examples include:

- Awarding contracts to relatives or close associates
- Holding undisclosed financial interests in supplier or partner entities
- Accepting personal benefits from vendors or service providers

Any actual or potential conflict must be disclosed to management promptly for review and guidance.



TOKYO (K) SERVICES LIMITED

📍 Kenyatta Street, Santuri Court, 2nd Floor

☎ +254-722-647-101

✉ tokyokservices@gmail.com



P.O Box 8710-30100

Eldoret, Kenya



www.tokyogroupkenya.com

8. PROCUREMENT INTEGRITY

Procurement activities shall be conducted in a manner that upholds:

- Fairness and impartiality
- Transparency and accountability
- Competitive and objective selection processes
- Proper documentation and auditability

Suppliers and service providers shall be selected based on merit, including quality, cost-effectiveness, reliability, and alignment with Company standards.

9. REPORTING MISCONDUCT

Employees and stakeholders are encouraged to report any suspected corruption, fraud, or unethical behavior.

Reports may be submitted through:

- Company management
- The designated compliance officer
- Approved internal reporting channels

All reports will be handled confidentially and assessed promptly. Individuals who raise concerns in good faith will be protected from retaliation or adverse consequences.

10. DISCIPLINARY ACTION

Any individual found to have engaged in corrupt or unethical conduct will be subject to disciplinary measures, which may include:

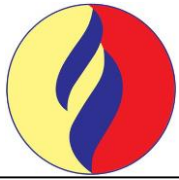
- Termination of employment or engagement
- Legal proceedings where applicable
- Referral to relevant regulatory or enforcement authorities

Third parties, including contractors and suppliers, may face contract termination and exclusion from future engagements.

11. TRAINING AND AWARENESS

The Company shall ensure that:

- Employees receive appropriate training on anti-corruption laws and ethical standards
- Personnel understand their obligations under this Policy
- Ethical conduct is consistently reinforced across all levels of the organization



TOKYO (K) SERVICES LIMITED

📍 Kenyatta Street, Santuri Court, 2nd Floor

☎ +254-722-647-101

✉ tokyokservices@gmail.com



P.O Box 8710-30100

Eldoret, Kenya

www.tokyogroupkenya.com

12. MONITORING AND COMPLIANCE

Compliance with this Policy will be monitored through:

- Internal audits and reviews
- Management oversight and controls
- Procurement governance mechanisms
- Investigation of reported incidents

Any breaches identified will be addressed without delay.

13. POLICY REVIEW

This Policy shall be reviewed periodically to ensure it remains effective, relevant, and aligned with evolving legal and regulatory requirements.

14. APPROVAL

This Anti-Corruption and Anti-Bribery Policy is approved by the Management of Tokyo Kenya Services Limited and is applicable to all company operations.

Managing Director

Tokyo Kenya Services Limited

Signature: _____

Date: _____