

ANTI BRIBERY POLICY

Preface

Writer Corporation (called the 'Company') through its 'Code of Conduct' is committed to the highest standards of moral and ethical behavior. Bribery and corruption offences present serious risks for every business and breaches can lead to unlimited fines and / or imprisonment for individuals. The enforcement of bribery and corruption laws in many countries is increasingly stringent, and our Global presence needs to take cognisance of this. Writer Corporation respects all laws relevant to countering bribery and corruption in all the jurisdictions in which the Company operates, particularly laws that are directly relevant to specific or local business practices.

Through this policy, Writer Corporation is committed to maintain the highest ethical, integrity, professional and legal standards in all its activities undertaken through its employees or third parties acting on its behalf, across various international jurisdictions.

Also Writers Corporation's Code of Conduct reflects the Company's commitment to ensuring that the acceptance or offering of hospitality and gifts is reasonable and appropriate and subject to managerial review.

Purpose

The purpose of this policy is to:

- Prohibit activities involving bribery and corruption
- Establish procedures for reporting such activities.
- Assign responsibilities regarding the prevention, detection and investigation of corrupt activities and implementation of the policy.
- Assist in promoting a climate of ethics and integrity to be upheld by the Company across domestic and international operations

Applicability

This policy applies to all Writer Corporation employees (and their related Associates and Affiliates) and third parties acting on behalf of the Company, and extends to all business dealings,



in all jurisdictions within which Writer or its subsidiaries operate. For the purposes of this policy 'connected persons' includes family members , including spouse , dependants or civil partner, anyone in 'an enduring family relationship', children and step children and their extended family.

This policy applies to any bribery / corrupt practice / irregularity (as defined below) that is detected or suspected, involving:

- Employees.
- Trainees.
- Contract Staff.
- Shareholders.
- Consultants.
- Vendors.
- Service Providers.
- Contractors.
- Outside agencies any other parties with a business relationship with Writer Corporation.

This policy should be implemented in conjunction with the Company's Code of Conduct and Anti Fraud Policy.

Definition

Bribery or corruption can be defined as **the offering, promising, giving, accepting or soliciting of an advantage as an inducement for an action which is illegal or a breach of trust.** Bribery and corruption are most rampant in seeking routine regulatory approvals and to win new business from prospective clients

The most prevalent forms of bribery and corruption stem from:

- Payments to a company's employees or their relatives, or to those of a third party, to secure advantage in business transactions.
- Direct or indirect Political contributions made to secure advantage in business transactions.
- Charitable sponsorships used to secure advantage in business transactions.
- Facilitation payments or kickbacks made to secure or accelerate routine or necessary business actions.
- Gifts, hospitality and expenses payments made to secure advantage in business transactions.

- Any act of request, offer, solicit, make or receive any payments or inducements which are illegal, unethical or represent a breach of trust.
- Any act involving use of contracts or consulting agreements, to channel improper payments through agents or intermediaries, to public or government officials.

Responsibilities

The Chief Compliance Officer is responsible for establishing this policy within Writer Corporation, supported by an appropriate corporate culture led by the Board, which prohibits bribery and corruption involving Writer Corporation employees or any third parties acting on behalf of the Company.

The Management of the Company / Group is responsible for the detection and prevention of bribe, corruption and / or other inappropriate practices.

- The JMD / CEO of each business or the CMD / Corporate Function Head is responsible for establishing appropriate responsibilities, procedures, training and internal controls, within their respective operations to ensure prevention of corrupt practices, consistent implementation of this policy across all jurisdictions, and compliance with its requirements
- The JMD / CEO of each business or the CMD / Corporate Function Head to ensure that this policy along with the Code of Conduct and Anti Fraud Policy is well communicated to all staff

Every business, employee or third party acting on behalf of Writer Corporation is responsible to:

- Ensure compliance with the terms of this policy and report any suspected corrupt practices in accordance with this Policy and / or 'Anti Fraud Policy' and / or 'Code of Conduct'.
- Ensure that they are familiar with the types of improprieties that might occur within his or her area of responsibility, and be alert for any indication of corrupt practices.
- Ensure appropriate due diligence is undertaken in relation to the appointment of all such parties listed above and monitoring of their activities to whom this policy is applicable.
- Seek appropriate legal advice as necessary when there is a conflict with respect to inclusion of the activity as falling under this policy.

Compliance and Administration

Compliance with this policy will be subject to regular review and audit. Failure to observe the terms of this policy may constitute a disciplinary offence and may expose individuals to civil or criminal proceedings including but not limited to dismissal of services.

The Anti Bribery Policy will be hosted on the company's website and Intranet, and a paper copy of this will be made available to any person on demand from any of the offices. The Company reserves its right to amend or modify this Policy in whole or in part, at any time without assigning any reason whatsoever, after due consultation with the Board / Audit Committee

The Chief Compliance Officer is responsible for the administration, revision, interpretation, and application of this policy. The policy will be reviewed annually and revised as needed to ensure it remains suitable, effective and appropriate, with respect to the Company's operations and the jurisdictions within which it operates.

The policy is implemented with effect from **August 1, 2011**.

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