

ANTI BRIBERY & CORRUPTION

IRM Energy Limited ("IRMEL") has zero tolerance attitude towards bribery and corruption. Any employee found to be indulged in any of the form of bribery or corruption ("Corrupt Practices") will be subject to disciplinary action, up to and including termination of employment, in accordance with applicable laws and Company Polices.

The following is the list of "red flags" that indicates possible existence of Corrupt Practices:

- Forgery in travel bills and false claim of expense, especially through vouchers.
- Misappropriation/theft of material, funds, securities, supplies or other assets;
- Unauthorized destruction, removal or inappropriate use of records, furniture, fixtures and assets;
- Forgery or alteration of any document, record or account belonging to IRMEL;
- Forgery or alteration of a cheque, bank draft, account or any other financial instrument;
- Mis-utilization of IRMEL funds for personal purposes
- Authorization or receipt of payments for goods not supplied or services not rendered;
- Making false written or oral statements or representation with respect to Company activities;
- Impropriety in the handling or reporting of money or financial transactions;
- Disclosing confidential and proprietary information to unauthorized parties;
- Bribery or kickbacks;
- Accepting or seeking anything of material value from contractors, vendors, or persons providing services/materials to the IRMEL;
- Any other act that falls under the scope of fraudulent activity.