



Compliance Training Program

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FIXMANN LIMITED
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INTRODUCTION

The FIXMANN Training Program is to commit personnel to set guidelines for ethical conduct and also determine penalties for violation. It helps FIXMANN to ensure that we operate within the law and stay true to our values and ethical principles that are important to the company's business and identity. The training is intended to educate company personnel on the three principles addressed by the FIXMANN Business Conduct and Ethics Code for Compliance. These principles are

- Obligation to Public
- Obligation to FIXMANN
- Obligation to the Professions involved in FIXMANN operations

SPAN/SCOPE OF TRAINING

Minimum of one hour compliance training is mandatory for all employees of FIXMANN limited. This training shall cover the information in the FIXMANN Business Conduct and Ethics Code. The Training shall include quizzes of which the employee must score 100%. Repeated attempts shall be allowed. Refresher shall be conducted for all personnel annually. The HR Manager shall be accountable for ensuring this training is done and recorded.

REPORTING POLICY

All employees and board members are expected to comply with the standards and report any violation promptly. The individual cannot be retaliated against if he or she reports the violation properly

The compliance officer shall report directly to the managing director

Baseline audits shall be done for all critical processes and procedures. Reviews shall be done at most every three years. All audits and reviews must be documented and reported to the managing director

Objectives of Baseline Audits (Risk Assessments)

1. Outlines current operational standards
2. Identifies real and potential weaknesses
3. Offers recommendations
4. Provide baseline against future performance can be measured

DICIPLINARRY ACTION STEPS

1. Verbal warning
2. Written warning
3. Suspension
4. Fine
5. Termination

WAYS FIXMANN PLANS TO SAVE FUTURE COST OF COMPLIANCE

1. Embed quality into existing processes
2. Centralize common processes and controls
3. Focus on corporate culture
4. Improve information system processes
5. Emphasize training
6. Monitor marketing and compensation.

COMPLIANCE HOTLINE

All employees are encouraged to report any compliance violation as soon as observed directly to the HR Manager.

While reporting, the employee is reassured that

- Employee can remain anonymous
- There shall be no retaliation for reporting
- Employee is not required to provide name and contact information when reporting an issue
- Employee is promised of confidentiality hen reporting an issue
- Employee is promised prompt investigation of the issue reported.

Original Approval Date: June 20, 2023

Godfrey Mayuku
Approved by: June 20, 2023

Godfrey Mayuku
Managing Director

Ultimately accountable for compliance	Managing Director
Induction training for new employees will be provided by	HR Manager
Arrange for compliance audits conduct, reporting and records	Compliance Officer
Job specific training will be provided by	Section managers
Training records will be kept and retained by	HR Manager
Training will be identified, arranged and monitored by	Section Manager

SCHEDULE A- Sample Compliance quizzes

1. FIXMANN Compliance Program describes the steps the company has taken to ensure compliance with the industrial codes. True/False
2. FIXMANN code of conduct is a statement of policy that applies to all employees an contractors True/False
3. FIXMANN code of condux addresses all of the following except
 - a. Compliance with Laws and Regulations
 - b. Stock and Security training
 - c. Conflict of interest
 - d. Fraud information
 - e. Assignment and Inventions
 - f. Confidential Business information
 - g. Use of company property
 - h. Reporting of Violence
 - i. Work Environment
 - j. Discipline of Violators

4. This law makes it illegal for employees of FIXMANN to knowingly and willfully offer, paying, soliciting, or receiving, directly or indirectly, anything of value if the purpose is to 'induce' preferential processes or favors.
 - a. The anti-bribery law
 - b. The Anti-solicitation provisions
 - c. The false claim Act
 - d. The Civil monetary Policy
5. All examples of Fraud and Abuse except
 - a. False claim that services were rendered
 - b. Billing of materials not supplied
 - c. Soliciting, offering or receiving kickback, bribe or rebate in exchange for preferential favors either for self or for FIXMANN
 - d. Accidentally disclosing a customer's confidential information to another organization without authorization from the customer
6. The penalty for violation of the anti-bribery law is what?
7. What does ICPC and EFCC stand for?
8. Fixmann Progressive Discipline Structure applies to only non-management personnel > True/False
9. When you have a concern about a possible compliance violation, it is best to contact only your Supervisor? True/False
10. FIXMANN must comply with applicable laws because
 - a. Supply Chain Management and Engineering are highly regulated and may have high risk implications on safety, reputation, legal etc.
 - b. Complying makes good business sense as an effective compliance program helps organizations identify and address specific risk areas.
 - c. Federal and state governments are increasing enforcement actions against out of compliance providers and suppliers.
11. Since FIXMANN has a compliance officer, you only need to concern yourself with the day-to-day activities and not concern yourself with all policies and procedures. True/False
12. How is compliance defined?
13. Risk of fraud and abuse arises from
 - a. Inability to respond customer demands
 - b. Ability to pay for, induce more orders from customers
 - c. Our undue familiarity and relationship with customer buyers or key officers
 - d. The fact that the industry we relate in is highly regulated
14. What are the applicable laws that can affect FIXMANN's business operation?
15. You work for FIMANN from 8am to 5pm and work for a direct competitor over the weekend. Is that a possible conflict of interest? True/False
16. FIXMANN Compliance program sets forth the means by which the code of Conduct is to be implemented and monitored
17. Having support from the Board, Management, and Staff is very important for any compliance program. True/False
18. The code of conduct should include a detailed outline of procedures for handling questions about compliance or ethical issues, beginning with a description of chain of command. True/False
19. Who is the corporate compliance officer?
20. Which of the following are the 7 Essential Elements of a Compliance Program
 - a. Written policies and procedures
 - b. Designated compliance officer and compliance committee
 - c. Effective training and education
 - d. Effective lines of communication
 - e. Internal monitoring and auditing

- f. Enforcement and discipline
- g. Corrective actions to detected problems
- h. Operational processes and procedures