

Rainbow Technology Services 's Integrity & Compliance Guide Document which we as a company and every individual follows and we have committed to this principles

Our understanding and commitment to Integrity In the work Place:

- Employers and business leaders can benefit from integrity in the work place.
- Integrity involves moral judgement and character ,honest and leadership values.
- Individual who show integrity in workspace not only understand right from wrong but they practice it in all they do.
- This is beneficial in a business environment where trustworthy actions set the foundation for successful business relationship.
- We at Rainbow Technology Services adhere to this principle in all aspect of our business.





Rainbow Technology Services 's compliance & Adherence to Foreign Corruption Act (FCPA) and understanding of its practices

- Anti Bribery Requirements Prohibit:
- The FCPA prohibits providing or even offering "anything of value" to government
- officials to improperly influence them. Anything of value is very broad -- examples
- include cash, computer equipment, meals, entertainment (e.g. tickets to a game or
- concert), travel, even if it is to attend a business conference.
- ... It can even be offering a job or internship for a family member of a government
- official. Sometimes regulators focus on very, very small gifts if they're part of a
- · pattern of giving.
- Boks & Records Requirements :
- In addition, it is important to have books and records that accurately and fairly reflect
- all of our transactions in reasonable detail and adequate internal controls to prevent

and detect any violations of policies.





Rainbow Technology Services follows the following steps to ensure that our compliance program remain effective

- All our staff are committed to our compliance policies as stated in this documents so every 2 years we are also required by IBM and other international partners to complete an integrity training which covers all of this compliance controls and policies which combat fraud, money laundering, bribery, corruption, and terrorism.
- Training & Continue advice of all our staff and consulting partners.
- We also deal with incentive and Disciplinary Measures .
- Third party Due Diligence and payments.
- Confidential Reporting and internal investigation





We also follow strict Financial Integrity principle

Accurate Business Records:

- We ensure that all our business records are complete, accurate and transparent including:
- Purchase orders from our customers and our invoicing to our customers.
- Sales report
- Before we can commence a project we expect to get an official purchase orders from our customer to ensure the legitimacy of the project.

Terrorism:

• We are not allowed to do any business with any country which is banned by the USA Government and we also wont supply any of our services to any terrorism group of any type named by any government around the world.



• So Rainbow Technology Services adhere to the strictest rules regarding Terrorism as most of our products services are governed by the laws of the USA



Avoiding Money Laundering and Funding Terrorist Activities

- Rainbow Technology Services has committed comply with applicable laws prohibiting money laundering and terrorism financing.
- So we Watch out for the following:
- Be alert for suspicious transactions, such as:
- Payments made in currencies other than the currency specified in the contract.
- Over-payments and requests for refunds
- Unusual fund transfers to or from parties or countries not involved in the deal.

This is part of the certificate which we complete which I have attached as part of the compliance policy





2/17/2022

Chief Executive Officer

