



# ANTI-BRIBERY AND CORRUPTION POLICY STATEMENT



**The Group prohibits bribery and corruption of or by any person or company, in any jurisdiction, wherever they are situated and whether they are a public official or body or private person or company or by any individual employee, agent or other persons or body on the Group's behalf.**

**WE SHALL NOT:**

- give, promise to give, or offer, a payment, gift or hospitality with the expectation or hope that an improper business advantage will be received, or to reward an improper business advantage already given;
- give or accept a gift or hospitality during any commercial negotiations or tender process, if this could be perceived as intended or likely to influence the outcome;
- accept a payment, gift or hospitality from a third party that we know or suspect is offered with the expectation that it will provide a business advantage for them or anyone else in return;
- accept hospitality from a third party that is unduly lavish or extravagant under the circumstances;
- offer or accept a gift to or from government officials or representatives, or politicians or political parties;
- threaten or retaliate against another individual who has refused to commit a bribery offence or who has raised concerns under this policy; or
- engage in any other activity that might lead to a breach of this policy.

**The Group also prohibits facilitation payments. The Group prohibits “turning a blind eye” to or ignoring suspicious actions on the part of the Group's employees or third parties.**

## Giving and Receiving Gifts/Entertainment

**The Group prohibits the giving or receiving of gifts and entertainment if they are any of the following:**

- a. cash or cash equivalents (such as gift certificates, loans, stock, stock options);
- b. unduly lavish;
- c. unreasonable, disproportionate or which goes beyond the standards or norms in the industry;
- d. offered in return for something (rather than being intended only to improve the image of the Group, to better present products and services, or to establish cordial relations). For example, gifts and entertainment must not:
  - i. involve parties engaged in a tender or competitive bidding process; or
  - ii. be intended to influence the recipient's objectivity in making a business decision; or
  - iii. otherwise be intended to influence the recipient to perform a function improperly; or
  - iv. be intended to influence a public official in order to obtain or retain any advantage.
- e. be potentially embarrassing to the Group, the third party or the third party's organisation if it became publicly known;
- f. be potentially unlawful in either your country or the third party's country;
- g. be in breach of the rules or code of ethics of the third party's organisation; or
- h. be paid for personally in order to try to avoid these rules.

**The Group prohibits solicitation of gifts or gratuities.**

### DONATIONS

The Group only makes charitable donations that are legal and ethical under local laws and practices.

### PROTECTION

The Group prohibits and will not tolerate any retribution or retaliation against anyone who has, in good faith, (i) sought advice regarding prohibited conduct (ii) reported a suspicion of prohibited conduct or (iii) refused to participate in prohibited conduct.

