



---

## ACCESS WORLD ANTI-CORRUPTION AND BRIBERY POLICY 30 DECEMBER 2022

The information contained in this document is confidential and for the exclusive use of the employees of Access World. The dissemination, distribution, or copying of any information contained in this document to any third party without prior written consent of Access World is strictly prohibited.

# TABLE OF CONTENTS

<b>1.</b>	<b>INTRODUCTION</b>	<b>3</b>
<b>2.</b>	<b>WHO DOES THIS APPLY TO?</b>	<b>3</b>
<b>3.</b>	<b>WHAT IS OUR COMMITMENT?</b>	<b>3</b>
3.1.	<i>Public Officials</i>	4
3.2.	<i>Facilitation payments</i>	4
3.3.	<i>Payments made under duress or extortion</i>	4
3.4.	<i>Gifts and Entertainment</i>	4
3.5.	<i>Sponsorships, charitable contributions and community investments</i>	5
3.6.	<i>Political Contributions</i>	5
3.7.	<i>Business Partners</i>	5
3.8.	<i>Mergers and acquisitions</i>	5
3.9.	<i>Accurate record keeping</i>	6
<b>4.</b>	<b>SPEAKING OPENLY</b>	<b>6</b>
<b>5.</b>	<b>CONSEQUENCES</b>	<b>6</b>
<b>6.</b>	<b>APPENDIX – KEY TERMS</b>	<b>7</b>

## 1. INTRODUCTION

Corruption and bribery are illegal and unethical. They destabilise communities, undermine the rule of law, and pose serious threats to sustained economic progress and the healthy operation of markets. Failure to address the risk of corruption and bribery may undermine our reputation and lead to investigations, fines and / or penalties for Access World companies and individuals.

We do not engage in corruption and we never pay bribes, regardless of local custom or practice. Access World's position on corruption is clear: the offer, payment, authorisation, solicitation and acceptance of bribes and other improper advantages is unacceptable.

This Anti-Corruption and Bribery Policy sets out Access World's approach to the prevention of bribery and other forms of corruption.

## 2. WHO DOES THIS APPLY TO?

This policy applies to all employees, directors and officers, as well as contractors under Access World's direct supervision, working for an Access World office or location directly or indirectly controlled or operated by Access World worldwide.

## 3. WHAT IS OUR COMMITMENT?

We do not tolerate bribery of any kind, whether to a public official or a private individual.

We never offer, provide or authorise bribes of any kind, including facilitation payments, either directly or indirectly, to a public official or a private individual.

We never request or accept bribes of any kind, whether directly or indirectly.

A bribe may be monetary or non-monetary, tangible or intangible. A bribe may take the form of, or be facilitated through:

- payment of money;
- gifts or entertainment;
- discounts, loans and / or financing given on non-commercial terms;
- rebates or kickbacks in relation to services provided;
- overpayments to business partners;
- use of assets at a discount or free of charge;
- sponsorships, charitable contributions and community investments;
- political contributions;
- employment or internships; or
- information or assistance.

To manage our bribery and corruption risk, we implement a range of procedures and controls relating to dealings with public officials, gifts and entertainment, our business partners, sponsorships and donations, political contributions and record keeping.

We remain alert to corruption and bribery red flags and report them to Compliance.

### **3.1. Public Officials**

Dealing with public officials brings a higher risk of corruption or the perception of corruption. We are especially careful when communicating, exchanging gifts and entertainment with public officials or providing assistance to public officials.

### **3.2. Facilitation payments**

In certain jurisdictions, public officials may request small payments, known as facilitation payments to expedite or to secure the performance of a routine governmental action such as issuing permits, licenses, or other official documents; processing government papers such as visas; providing customs clearances; providing police protection; providing utility services; or handling cargo.

Facilitation payments are a form of bribery. We never pay, or authorise the payment of, facilitation payments.

### **3.3. Payments made under duress or extortion**

Access World prioritises the physical safety and well-being of its employees and contractors. If our welfare and safety is at risk, we take reasonable steps to remove ourselves from danger. In exceptional circumstances, this may include making a payment to a public official to ensure our safety in the situation. We must report any such incident to Compliance as soon as we are safely able to.

### **3.4. Gifts and Entertainment**

The proper management of the giving or the acceptance of gifts and entertainment is key to avoiding the risk they present of actual or with public officials perceived bribery or corruption.

We only give or accept gifts and entertainment that are:

- in good faith, occasional, reasonable and appropriate;
- a normal business courtesy; and
- transparent.

We don't give or accept gifts and entertainment:

- with the intent or prospect of influencing decision-making or other conduct;
- with the intent of obtaining any improper or undue advantage;
- which are capable of being regarded in any way as a bribe; or
- in the form of cash, which includes pre-paid cards or gift cards which can be redeemed for cash.

### **3.5. Sponsorships, charitable contributions and community investments**

We never make a sponsorship, charitable contribution or community investment in order to disguise a bribe, or to gain an improper business advantage.

We ensure before we enter into sponsorships, community investments or make charitable contributions we conduct risk-based due diligence. We monitor the appropriate use of our funds or resources when required.

### **3.6. Political Contributions**

We do not seek to influence the political process by improper or corrupt means. To mitigate this risk, we do not contribute any funds or resources towards any political campaign, political party, political candidate or any politically affiliated organisation.

### **3.7. Business Partners**

We expect our business partners to share our commitment to ethical and responsible business practices. We never authorise a business partner to engage in bribery or corruption on our behalf.

We take care to know who our business partners are by implementing our risk-based Know Your Counterparty programme.

To manage our bribery and corruption exposure associated with our business partners, we implement a range of controls and processes including screening, due diligence and monitoring, using a risk-based approach.

We implement additional controls with regards to high-risk business partners, such as business developers, joint venture partners, lobbyists, consultants or advisers interacting with public officials on our behalf. We conduct a detailed risk-based assessment prior to entering into these types of relationships, to enable us to identify, assess and mitigate the corruption risk presented by the engagements. Where appropriate, we also conduct ongoing monitoring and regular review of our high-risk business partner relationships.

In respect of mergers and acquisitions, we conduct thorough pre-acquisition due diligence and thereafter incorporate Access World's Compliance programme for those entities we control or operate.

### **3.8. Mergers and acquisitions**

When considering entering into a merger or acquisition, we conduct risk-based due diligence to understand any bribery and corruption risks associated with the transaction and take steps to address any identified issues. Where we acquire the right to control or operate a business, we promptly implement this policy, associated procedures and controls.

### **3.9. Accurate record keeping**

We ensure all transactions are accurately recorded in Access World's books and records in accordance with our procedures and reflect the nature and substance of the transaction.

## **4. SPEAKING OPENLY**

We are each responsible for ensuring that we meet our commitments. We expect our employees and contractors to speak openly and raise concerns about possible breaches of the Code of Conduct and this policy with their manager, supervisor or via other available reporting channels. Our Raising Concerns platform is available to employees, contractors and external parties. Access World takes concerns seriously and handles them promptly.

Access World has zero tolerance for retaliation against anyone who speaks openly about conduct they believe is unethical, illegal or not in line with our Code of Conduct and policies, even if the concern isn't substantiated, as long as they have not knowingly made a false report.

## **5. CONSEQUENCES**

Our policies reflect what is important to us. Access World takes breaches of our policies seriously. Depending on the severity of the breach, consequences may range from a warning to termination of employment.

**Zug, 30 December 2022**

## 6. APPENDIX – KEY TERMS

### **Bribe**

Anything of value, including any financial or other advantage, offered, provided, authorized, requested or accepted in order to improperly influence any person's action, inaction or decision, whether the person is a public official or private individual.

### **Corruption**

The abuse of power or position for personal gain.

### **Entertainment**

Any activity offered or received for free – or at less than market prices – including (but not limited to) meals, travel, accommodation, sporting events, recreational activities and hospitality.

### **Facilitation Payment**

Any payment, however small, to expedite or to secure the performance of a routine governmental action.

### **Public Official**

An officer, employee or representative of a state or state-controlled or -owned entity, which includes:

- any officer, employee or representative of any national or local government institution
- any person holding a legislative, administrative or judicial position of any kind
- any officer, employee or representative of a public international organisation such as the United Nations or World Bank
- any officer, director, employee or representative of any state-owned or -controlled enterprise or company
- any officer or representative of a political party, or any candidate for a political office.