



# Anti-Bribery and Corruption Policy



## Tradu Anti-Bribery and Corruption Policy

The Anti-Bribery and Corruption Policy (“ABC Policy” or the “Policy”) sets out the responsibilities of the Tradu group of companies (“Tradu”), Tradu employees, and anyone who performs services for or on behalf of Tradu (collectively “Associated Persons”<sup>1</sup>) in observing and upholding Tradu’s position on bribery and corruption. Tradu recognises that bribery and corruption are damaging to its legitimate business interests. More broadly, bribery undermines the rule of law and poses serious threats to sustained economic progress in developing and emerging economies and to the proper operation of free markets. Tradu conducts business across the globe and is committed to doing so with fairness, honesty, openness, and integrity. Through this Policy, and underlying procedures, systems and controls, Tradu aims to effectively prevent, detect, and deter bribery and corruption at Tradu.

Tradu is therefore committed to the highest standards of compliance with financial crime law and regulation, which includes the detection and prevention of money laundering, terrorist financing, sanctions, bribery and corruption, market abuse, fraud and data breaches (including identity theft), and other criminal acts (collectively referred to as “financial crime”).

Tradu has a zero tolerance approach to bribery and corruption and expects all Associated Persons to exhibit the same approach. Tradu is committed to implementing and enforcing effective systems and controls to counter, monitor for, and prevent bribery and corruption by:

- Upholding all laws relevant to countering bribery and corruption in every jurisdiction in which it operates. In particular, Tradu will uphold applicable provisions of the Financial Action Task Force Guidance and Recommendations, Basel Committee on Banking Supervision Guidance, The Wolfsberg Group Anti-Bribery and Corruption Compliance Programme Guidance, the United Kingdom Bribery Act 2010, the Cyprus Criminal Code, Cap. 154, the Cyprus Prevention of Corruption Law, Cap. 161, the Criminal Law Convention on Corruption of the Council of Europe and the Additional Protocol to the Convention, as ratified by Law 23(III)/2000 and amended by Law 22(III)/2012, Relevant Cyprus Securities and Exchange Commission Circulars, the Australian Criminal Code Act 1995, the South African Prevention and Combatting of Corrupt Activities Act (2004), and the United States Foreign and Corrupt Practices Act 1977;
- Setting out a clear anti-bribery and corruption policy and proportionate and effective anti-bribery and corruption procedures;
- Carrying out appropriate due diligence on third parties that conduct business with Tradu;
- Training employees and other relevant persons on internal and external anti-bribery and corruption obligations so that they can recognise and avoid the use of bribery or corruption by themselves and others;
- Requiring employees to be vigilant and to report any suspicion of bribery or corruption, providing them with suitable channels of communication, and ensuring sensitive information is treated appropriately;
- Rigorously investigating instances of alleged or confirmed bribery or corruption, notifying the relevant authority regarding potential or confirmed instances of bribery or corruption (as appropriate), and assisting the police and other relevant authorities in any resulting prosecution; and
- Taking a firm and vigorous action against any Associated Persons involved in bribery or corruption or who do not support anti-bribery and corruption requirements.

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<sup>1</sup> An “Associated Person” is anyone who performs services for or on behalf of Tradu.

## Applicability

This Policy applies to all Associated Persons. The Policy is applicable globally across Tradu and in line with applicable global rules and regulations.

## Requirements & Compliance

All Associated Persons are prohibited from directly or indirectly:

- Offering, promising, giving, requesting, accepting, or agreeing to receive a bribe of any kind, in any form;
- Offering, promising, or transferring anything of value to a public official in order to influence the public official and obtain or retain business, or to obtain or retain an advantage for any Associated Person including offers, promises, or transfers to any third party, such as a family member, agent, or legal entity, in order to influence a public official;

Making a payment, offer, request, acceptance, or promise of anything of value to:

- a) public officials;
- b) political parties or party officials;
- c) candidates for political office;
- d) any other person while knowing that such person will pass the payment, offer, or promise to any of the above; or
- e) private individuals or legal entities

With or without corrupt intent for the purpose of:

- a) influencing an official or private individual's (or legal entity's) act or decision;
- b) inducing a person to do or omit to do acts in violation of his or her official duty;
- c) inducing that person to use his or her influence with a government to affect or influence any government decision or action; or
- d) securing an improper advantage

To assist in obtaining or retaining business; and

- Aiding, abetting, or counselling of any of the above-prohibited payments.

It is important to note that a corrupt act does not need to succeed in its purpose to violate this Policy.

All Associated Persons are required to adhere to this Policy and any reporting requirements herein. Additionally when adhering to this Policy, Associated Persons should take into consideration and abide by all applicable anti-bribery and corruption legislation and regulations including but not limited to those in their local jurisdiction.

## Reporting

Tradu expects all Associated Persons who have concerns about any aspect of Tradu's business or any other concerns, such as cases of suspected unethical or unlawful behaviour, to come forward and voice those concerns openly, confidentially, or anonymously.

Should an Associated Person select to voice their concerns or find themselves in a situation of a possible breach of this Policy, the Associated Person should contact Tradu at [accountinfo@tradu.com](mailto:accountinfo@tradu.com) or in writing to the General Counsel at 20 Gresham Street, 4th Floor, London EC2V 7JE, United Kingdom.

## Recordkeeping

In accordance with this Policy, and all relevant laws and regulations, Tradu maintains detailed, accurate, and proper books, records, and financial reporting, which properly reflect the substance of corporate payments and transactions.