

Anti-corruption

Overview

This document sets out the policy of 360 ONE and its subsidiaries, on combating corruption and to conduct all of our business in an honest and ethical manner. We take a zero-tolerance approach to bribery and corruption and are committed to act professionally, fairly and with integrity in all our dealings wherever we operate. We are also committed to implement and enforce effective systems to counter bribery. This document sets out the organization's long-standing policy on bribery and other forms of unlawful payments. It applies to all subsidiaries and operations.

Scope

This Policy shall apply to all staff including directors, officers, shareholders of the Company and all appointed third party representatives of the organization such as agents, consultants, others working on behalf of the organization irrespective of their location, function or grade. We require those providing services on our behalf to undertake their business without bribery or corruption.

It is required to comply with all applicable anti-bribery and corruption laws and regulations when doing business on behalf of the company. These laws include the United Kingdom Bribery Act 2010 and other applicable laws relating to anti bribery and anti-corruption.

Definitions

"Bribery" is the "offer of undue reward by or to any person in a public sector, private employee, colleague or representative of another organization in order to influence his / her behaviour in office and to induce them to act in contravention of the rules and regulations, ethics, trust and integrity".

"Corruption" is the "abuse of entrusted power for private gain".

The key principles

360 ONE employees and third-party service providers are prohibited from:

- Offering or suggesting a Bribe, or authorizing the offer or suggestion of a Bribe
- Paying Bribes
- Soliciting or accepting a Bribe to influence a decision, to obtain unauthorized access to confidential information, or to commit or omit to do an act, whether or not the outcome would have been the same without the Bribe
- Making facilitation payments

- Using another party to conduct any of the above
- Using vendors or suppliers that do not have high standards on bribery and corruption
- Processing funds known to be, or reasonably suspected of being, the proceeds of bribery or corruption

For the purposes of this Policy 'facilitation payment' means small unofficial payments paid to speed up an administrative process or secure a routine government action by an official. However, facilitation payments should be contrasted with official, lawful, receipted payments (typically to an organization rather than an individual) to expedite certain functions, e.g. where there is a choice of fast track services to obtain a passport.

If the safety or loss of liberty of staff or third-party service provider is at risk, the payment should not be refused. In all circumstances any demand for facilitation payments must be reported to the compliance officer immediately.

The organization shall endeavour to appoint third parties as agents and contractors with high repute and who have committed to adherence with all applicable laws and regulation. In addition, the bribery and corruption risks are monitored and managed effectively in order to maintain a strong control system.

Infringements of this Policy may result in disciplinary action taken by the organization, including dismissal, and may involve criminal or regulatory proceedings for individuals and the organization.

This Policy should be read in conjunction with 360 ONE's Gifts policy as it has been widely acknowledged that corporate gifts and hospitality, whether lavish or not, can be used as a subterfuge for bribery and corruption. It is therefore important that compliance with this Policy includes adherence to the rules within 360 ONE's Gifts policy as well as following the spirit of 360 ONE's zero-tolerance approach to bribery and corruption.

Ethical guidance

Policies and guidance cannot cover every circumstance. We therefore provide some guidance below to help you make decisions about appropriate business conduct. If you can answer yes to following quick questions, you might feel comfortable in proceeding.

- Is the action legal?
- Is it right? Is it honest?
- Is the action consistent with the terms and spirit of this policy and our values as a business?

- Does it avoid creating a sense of obligation?
- Can I justify this to my manager, the responsible person and to my family?
- Would I feel comfortable if the action became public knowledge?

In any case of doubt, you should discuss the situation with the Head of Risk or the Chief Operating Officer.

The following are examples of relationships and events that could lead to a higher risk of bribery and corruption.

Fee payments

Where an agent or intermediary is used to make introductions to officials of public or government bodies and agencies, steps must be taken to ensure that any fee paid by the organization is proportionate to the activity being performed and in accordance with local law and the requirements of this anticorruption policy.

No such fee payments can be made without the express approval of business line management who may obtain advice from Compliance.

Charitable donations

When funds are donated in the organization's name for charitable purposes, appropriate due diligence must be conducted to ensure that, where a public official or public body is associated with the charity, written agreement is obtained on the purpose for which the funds will be used.

Any charitable donation must always be made directly to a recognized charitable organization and not via another party or individual. In case of doubt refer to line management who may obtain advice from Compliance officer.

Public officials

Appropriate due diligence must be conducted when public officials, their relatives or their close associates are invited to any entertainment provided by the organization, or when payments are made to them by or on behalf of the organization.

Political donations

No political contribution to a candidate for public office, an elected official, a political party or political action committee, can be made, on behalf of the organization without prior approval from the Head of Business Risk.

Offers of employment

Care must be taken when providing work experience or employment to people that are connected to, or are relatives of, senior public officials. Although it is not prohibited to employ such staff it is important to avoid any perception that any hiring is for an improper purpose, or there is some quid-pro-quo. Where such a hiring is being considered, approval from business line management must be obtained.

Six Practical Procedures

- Senior management information:

On receipt of information relating to bribery or corruption, the Chief Operating Officer or Head of Business Risk will keep Senior management informed of the material findings arising out of any investigation and the fallout of such event.

- Employee conduct:

Employees are required to report any knowledge or suspicions of the request for, offering, giving or receiving of a corruption-related payment. A failure to do so may be considered gross misconduct.

No employee will suffer demotion, penalty or other adverse consequence for refusing to pay or accept a corrupt payment even if such a refusal may result in the organization losing business or failing to win a deal.

- Gifts and Hospitality:

Employees may accept gifts and hospitality only in conformity with the organization's Gift Policy.

- Internal Communication and Training:

The organization will communicate these principles and practical procedures to all employees and will reflect this policy on its website and in the Employee Handbook/Code of Conduct etc. Training will be provided to staff so that they are aware of this Policy, relevant anti-corruption legislation and their obligations under the policy and their contract of employment. Enhanced training will be provided to employees in particularly high-risk roles.

- Associates:

The organization will conduct screening procedures on agents, advisers, contractors, intermediaries, and other representatives who supply material goods and services to it

("Associates") to protect the organization from the risk of it being associated with or benefiting from corrupt payments, and to ensure that the highest ethical standards are maintained.

The organization requires that Associates are made aware of this Policy and confirm that they will not participate in any transaction that will put it in breach of the Policy, and that such Associates have adequate procedures for preventing their own staff engaging in the giving or receiving of bribes, kickbacks, or facilitation/speed payments.

- Raising Concern:

The organization welcomes whistle-blower reports and encourages staff and third parties to draw to its attention instances of corporate as well as individual employee wrongdoing within the organization. The principles laid down in Vigilance and Whistle Blowers Policy shall apply to protect the interest of the whistle blower.
