

ANTI BRIBERY

POLICY STATEMENT

The Group has an excellent business reputation to protect and commits to doing business openly, fairly, honestly in the jurisdictions in which it operates and in accordance with all applicable laws, including Canada's *Corruption of Foreign Public Officials Act*, the U.S. *Foreign Corrupt Practices Act*, the *UK Bribery Act (2010)*, and the *Isle of Man Bribery Act (2013)*. As part of this commitment, the Group takes a zero tolerance approach towards bribery and facilitation payments throughout its global operations.

Group Personnel are strictly prohibited from:

- Offering, promising or making a payment gift or hospitality with the expectation or hope that a business advantage will be received, or to reward a business advantage already given
- Requesting, agreeing to receive, or accepting a payment, gift or hospitality in the expectation or belief that a business advantage will be awarded, or as a reward for an advantage already granted
- Bribing an individual in public office or public service anywhere in the world
- Making a facilitation payment to any individual
- Threatening or retaliating against another individual who has refused to commit or collude to commit a possible bribery offence or who has raised concerns under this policy
- Engaging in any other activity that might lead to a breach of this policy

This Policy statement and supporting guidance and procedures reflect the zero tolerance culture of the Group towards bribery and corruption.