

Our Anti-Bribery & Corruption Commitment

Accordience is committed to conducting our business in an open, honest, and ethical manner. We will not condone under any circumstances the offering, receiving or facilitation of bribes or any form of improper payments, and we will always strictly adhere to applicable corruption laws.

The fundamental integrity standards under which Accordience operates does not vary depending on where we work or who we are dealing with. Management at all levels are specifically responsible for ensuring that those reporting to them understand and comply with this policy and undertake relevant training in respect of it.

Our Policy and its Scope

Bribery is the giving, offering, or promising of anything of value to gain an improper business advantage. **Corruption** is the abuse of entrusted power for private gain.

Accordience has zero tolerance for bribery and corruption. Failure to comply with this policy, whether or not this is intentional, may lead to disciplinary action (up to and including dismissal); the termination of a relevant contract (if applicable); and criminal liability for such individuals (up to and including imprisonment).

Scope of this policy

Accordience's Anti-Bribery & Corruption Policy applies and pertains to:

- All of our locations, businesses, affiliates, and ventures where we hold a controlling interest; and
- All Accordience employees, contingent workers, contractors, or anyone who is engaged in activities where they are acting on behalf of the group.

Importantly, all those acting on behalf of the group in engaging with suppliers, contractors and business partners should communicate this policy and our Codes of Conduct as such relationships commence, and as appropriate thereafter.

Those who work with and for us should familiarize themselves with the following Accordience requirements pertaining to gifts and entertainment, public officials, and third parties. Any suspected violations of this policy should be reported through Accordience's Speak Up policy or to the Chief Compliance Officer.

Legal requirements and local-level obligations

The US Foreign and Corrupt Practices Act 1977, US Anti-Kickback Act 1986, and UK Bribery Act 2010 are the foundations for this policy. Additional local, legal obligations may also be relevant to Accordience businesses. If conflicting, legal obligations always take precedence over this policy and its associated processes.

Gifts & Entertainment

Entertainment, hospitality, and gifts are often a normal part of the development of business relationships and in many places are cultural practice. As well as having to meet standards applied by law, all entertainment, hospitality, and gifts should be ethical, relate to our business, and be infrequent and proportionate to the development of a transparent and honest business relationship. In this regard:

- **Never** make payments or provide gifts, entertainment, or favours if this could lead to someone misusing their position or performing their job improperly or if such giving breaches professional codes of conduct,
- **Never** misuse your position (or perform your job improperly) in connection with payments, gifts, entertainment, or favours provided to yourself or others, and
- **Never** provide gifts, entertainment, or favours in any form to a public official.

Public Officials

Public officials include members of central, local, and municipal governments and departments, any member of a public authority or police force, and employees of state-owned or controlled commercial enterprises. In some jurisdictions healthcare professionals are considered public officials (e.g. a nurse or physician in a government-owned hospital)

Employees of international organisations and political parties, political candidates, and the judiciary are also public officials.

Facilitation payments are small customary amounts paid to public officials to expedite routine clerical or administrative actions such as issuing permits. Accordience prohibits all facilitation payments. However in exceptional circumstances only, where for example an employee's personal safety is at risk, a facilitation payment could be made to avoid injury or loss of life.

If such an exceptional circumstance arises, please contact

compliance@accordience.com

as soon as it is feasible to do so.

Third Party Partners

Accordience could be liable for unlawful acts by third parties acting on our behalf. Hence, we must avoid actions that could even suggest improper influence.

Accordience never undertakes activities via third parties that we would not undertake ourselves. Third parties should be made aware of the terms of this policy and our Codes of Conduct, including the obligations they have in relation to such.

Accordience will not engage with third parties we know or reasonably suspect of engaging in bribery or corruption.

All payments and commissions to third parties must be made:

- Under the terms of a written agreement,
- In-line with Accordience and local policies applicable to our businesses,
- Via bank transfer through the accounts payable system and be fully accounted for, and
- In-line with generally accepted rates and practices for the service provided.

This policy, together with supportive internal processes, and our Codes and Commitments form Accordience's Anti-Bribery & Corruption framework. Please contact **compliance@accordience.com** with any questions pertaining to the specifics of this policy or our framework.

