

2018

One Global Market Limited – Anti Bribery & Corruption Policy

Anti-Bribery and Corruption Policy

The Anti-Bribery Policy and Corruption (the “policy”) outlines that One Global Market Limited (“OGM”) values its reputation for ethical behaviour and for financial probity and reliability. It recognises that over and above the commission of crime, any involvement in bribery will reflect adversely on its image and reputation.

OGM is also committed to implementing and enforcing effective systems to counter bribery by:

- Setting out a clear anti-bribery policy.
- Training all employees so that they can recognise and avoid the use of bribery by themselves and others.
- Encouraging its employees to be vigilant and to report any suspicion of bribery, providing them with suitable channels of communication and ensuring sensitive information is treated appropriately.
- Rigorously investigating instances of alleged bribery and assisting the police and other appropriate authorities in any resulting prosecution.
- Taking a firm and vigorous action against any individuals involved in bribery. Who is covered by the Policy?

This policy applies to all individual employees of OGM, including its branches, agents or other persons acting on behalf of OGM and its consultants, contractors, and any other person providing services to us.

What is a Bribe?

A bribe is a financial or other advantage offered or given:

- To anyone to persuade them to or reward them for performing their duties improperly; or
- To any public official with the intention of influencing the official in the performance of his duties

Gifts and Hospitality

This policy is not meant to prohibit the following practices provided that they are customary, are proportionate and are properly recorded:

- Normal and appropriate hospitality
- The use of a recognised fast track process which is publicly available on payment of an appropriate fee; and/or
- The offer of resources to assist a person or body, to make a decision more efficiently, provided that such is supplied for that purpose only.

Facilitation Payments and Kickbacks

We do not make, and will not accept, facilitation payments or “kickbacks” of any kind. Facilitation payments are typically small, unofficial payments made to secure or expedite a routine government action by a government official. Kickbacks are typically payments made in return for a business favour or advantage.

Record Keeping

We will keep financial records and have appropriate internal controls in place which will evidence the business reason for making any payments to third parties. It is vital that the following records are kept:

- All expense claims relating to hospitality, gifts or expenses incurred to third parties must be submitted in accordance with our expenses policy and specifically record the reason for expenditure.
- All accounts, invoices, memoranda and other documents and records relating to dealings with third parties, such as clients, suppliers and business contacts, must be prepared and maintained with strict accuracy and completeness. No accounts must be kept “off-book” to facilitate or conceal improper payments.

Employees Responsibility

The prevention, detection and reporting of bribery is the responsibility of all employees and the Board members throughout OGM. Suitable channels of communication will be maintained via the Whistleblowing process. Inevitably, decisions as to what is acceptable may not always be easy. If anyone is in any doubt as to whether a potential act constitutes bribery, the matter should be referred to OGM’s Compliance or Legal Counsel before proceeding. If necessary, guidance should also be sought from the Head of Compliance.

--END OF POLICY--