



UEXO \ FSC

# **Anti-Bribery & Corruption Policy**

v1.0

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# 1. Company Introduction

**UEXO Global Ltd.** has a global business licence, which is registered in Mauritius under the registration number 179291. UEXO Global Ltd, is licenced and authorised by the Mauritius Financial Services Commission (MFSC) with regulatory licence number GB21026300. The registered office of UEXO Global Ltd is, 12th Floor, Hennessy Court, Pope Hennessy Street, Port Louis, Mauritius 72201.

**UXO Services Ltd.** is registered in Cyprus with the registration number HE437025 and has its registered address at Archiepiskopou Makariou III, 84, Office 1, 6017, Limassol, Cyprus. UXO Services Ltd acts as license usage company of UEXO Global Ltd.

## 2. Policy Introduction

The Company is dedicated to conducting its business with honesty, integrity, and adherence to the laws of all the countries in which it operates. The purpose of this policy is to ensure compliance with relevant anti-bribery and anti-corruption laws and regulations, including the United Nations Global Compact Business Principles, and OECD recommendations on corruption.

The objectives of this policy are as follows:

- ★ Reinforce the company's commitment to anti-corruption compliance.
- ★ Establish standards of conduct for the prevention of corruption within the company.
- ★ Provide the basis for developing procedures to manage the company's corruption risk.

## 3. Definitions

The following terms are defined broadly to align with the spirit and intent of this policy:

- ★ "**Associates**" encompass family members, companies, or trusts in which Covered Persons or their families have an interest or are beneficiaries.
- ★ "**Bribery**" refers to the provision or acceptance of money, gifts, benefits, or any other advantage, whether financial or otherwise, as an inducement for dishonest, illegal, or unethical actions in the course of conducting business, or to gain an unfair or improper advantage.
- ★ "**Business**" includes all regular transactions, such as financial assistance, asset acquisition or disposal, leasing, and the provision or receipt of services.
- ★ "**Covered Persons**" include directors, employees, and officers of the company.
- ★ "**Government or Public Officials**" denote individuals holding legislative, administrative, or judicial positions, appointed or elected, who perform public functions on behalf of a country or territory
- ★ "**Officers of the Company**" encompass directors and company secretaries of the company.
- ★ "**Third Party/Parties**" represent suppliers, service providers, and other business partners.

## 4. Applicability

This policy applies to all Covered Persons and establishes the minimum standards of conduct. It should be read and applied alongside the company's existing policies, codes, and guidelines.

## 5. Policy responsibility

The Compliance Officer serves as the custodian of this policy, responsible for its administration, revision, and interpretation. The company is committed to periodic risk assessments regarding corrupt activities and provides training to Covered Persons on this policy.

## 6. Prohibited actions

The company maintains a zero-tolerance approach to bribery and corruption, conducting business fairly, honestly, and without improper influence. The Company strictly prohibits the solicitation, receipt, offer, promise, or provision of any financial or other advantages, directly or indirectly, to gain unfair or improper advantages, influence business judgement, or breach trust. Covered Persons must comply with this policy and ensure the utmost integrity in the company's business, particularly in the following areas:

### 1. Fraud and extortion

Covered Persons must not engage in fraud or extortion, including the direct or indirect acceptance of advantages through deception, for their personal or the company's benefit.

### 2. Bribery

The company prohibits all forms of bribery, regardless of whether the advantage or benefit is offered or received indirectly through intermediaries, customers, agents, or suppliers.

### 3. Facilitation Payments

Facilitation payments are strictly prohibited. These refer to bribes paid to government or other officials to expedite or secure the performance of an action. Any demand for bribes must be reported immediately to the company's Compliance Officer, even if the payment was not made.

## 7. Gifts and Hospitality

The company recognises the importance of fostering positive relationships with business partners. Modest gifts, entertainment, and reasonable expenses are acceptable if transparent and made in accordance with applicable laws. However, gifts, entertainment, or expenses offered or received in exchange for improper benefits, creating obligations, influencing business judgement, or causing conflicts of interest are strictly prohibited. Covered Persons may only offer or accept corporate or personal gifts and hospitality of modest value. Gifts and hospitality exceeding €100 must be recorded in the gifts and hospitality register.

## 8. Third parties

The Company understands that the conduct of Third Parties acting on its behalf reflects upon the Company's reputation and may have legal implications. Therefore, the company commits to ensuring Third Parties are aware of and adhere to this policy, conducting due diligence to assess their integrity, and implementing appropriate controls to monitor their use of the company's assets.

## 9. Sponsorships, Political and Charitable Contributions

The company engages in charitable contributions and sponsorships for socio-economic development, cultural, or sporting activities. These donations must not be perceived as given for improper purposes. All proposals for charitable contributions or sponsorships must be transparent, documented, and compliant with applicable laws and this policy. The company does not participate in party politics or make payments to political parties, politicians, or related organisations.

## 10. Engagement with Government or Public Officials

When meeting with Government or Public Officials to discuss legitimate company business, transparency and openness must be maintained to minimise the perception of corrupt activities.

## 11. Financial Books, Records, and Internal Controls

The company is responsible for maintaining accurate and detailed books, records, and internal controls that ensure accountability for shareholder assets. Any off-the-books payments or fraudulent accounting practices are strictly prohibited. Covered Persons must safeguard the company's assets and use them solely for authorised purposes related to their responsibilities.

## 12. Conflicts of Interest

Covered Persons must avoid conflicts of interest and fulfil their duties in the best interests of the company. They must not misuse confidential knowledge for personal or third-party gain, abuse their position, or be directly involved in any business interest that compromises their independence or conflicts with the company's commercial interests.

## 13. Speaking Up \ Reporting Bribery

Covered Persons and Third Parties have a confidential and secure means to report any conduct that contradicts the company's values, principles, or this policy. Reports should be made to the Officers of the Company.

## 14. Training

The Company will provide regular anti-bribery and anti-corruption training to its employees. Additionally, training may be conducted more frequently in the event of changes to relevant laws or when deemed necessary.

## 15. Non-Compliance Consequences

Covered Persons are responsible for reporting any actual or potential breaches of this policy to their line manager or Compliance Officer. Violations, including involvement in corrupt activities or failure to report breaches, may result in disciplinary action according to established procedures. Failure to report violations may constitute a legal offence in certain circumstances. The company is committed to reporting instances of corruption and dishonesty to the relevant authorities, and appropriate legal action will be pursued against individuals involved.

## Do you have any questions?

If you are unsure of the things stated within this policy, or have any questions, please contact us either via our live chat features, which can be found on our website, or by emailing us at [info@uexo.com](mailto:info@uexo.com).