

## **OML GROUP ANTI- BRIBERY & CORRUPTION STANCE**

OML Group has no tolerance for bribery and/or corruption either committed on behalf of the Group or by external parties seeking to bribe or corrupt OML Employees or agents. The Group has no appetite for any breach of anti-bribery/corruption legal and/or regulatory requirements – either local or extra territorial (e.g. UK Bribery Act 2010 and US Foreign Corrupt Practices Act 1977). Strong BU controls must be in place to effectively mitigate the reputational, regulatory and legal risks that arise from bribery and/or corruption cases.

It is recognised that due to the breadth and complexity of our business, and the fact that the Group operates in a number of difficult jurisdictions from a bribery/corruption perspective, there is a risk that breaches could occur despite the Group's best efforts and despite the Group's overall compliance with Bribery and Corruption legislation.

OML is committed to ethical and legal business conduct and OML and its employees must:

- Act legally and with integrity at all times to safeguard our employees, resources, tangible and intangible assets, and our reputation
- Create and maintain a trust-based and inclusive culture in which bribery and corruption are not tolerated
- Conduct all business relationships in an ethical and lawful manner
- Co-operate fully with law enforcement and regulators

It is strictly prohibited for any employee of OML to engage in bribery or corrupt activities of any kind, for any purpose, including but not limited to OML's benefit, the employee's benefit or that of the employee's family, friends, or business associates.

- Employees are not allowed to give (other than for approved charitable or community support projects) or receive money in an OML business context.
- OML businesses are prohibited from making direct or indirect financial contributions to political parties, organisations or individuals engaged in politics.
- OML businesses are prohibited from making Facilitation Payments.

### **Gifts and Hospitality / Entertainment**

- Giving and receiving gifts and hospitality/entertainment is acceptable provided it is not excessive nor could be interpreted as an attempt to materially influence the person receiving the gift/hospitality.
- Employees are not allowed to give (other than for approved charitable or community support projects) or receive money in an OML business context.
- Employees must seek approval for gifts and hospitality/entertainment accepted or offered above local applicable limits.

## **Requirements for Identifying and preventing Bribery and Corruption**

### **Risk assessment**

OML businesses regularly assesses the risk of bribery and corruption and measures to manage and/or mitigate the risk, including regular risk assessments on third parties and countries to assess bribery and corruption risks.

### **Due diligence**

- An appropriate level of due diligence is performed at the outset of any business relationship with partners, agents/intermediaries, counterparties, joint ventures, sponsorships etc.

- The level and depth of due diligence increases where the risk of bribery or corruption is perceived to be higher –e.g. due to the size and nature of the deal and the jurisdiction where the deal is to be negotiated/completed/implemented.
- Due diligence covers integrity of the counterparty (this also includes key people within counterparties on a look through basis). Areas include Corporate interests/Conflicts of Interest, sanctions, political exposures, criminal/civil legal exposures and adverse media.

### **Contracts with Third Parties**

Anti –bribery and corruption clauses are incorporated in third party contracts including agents and sets out the OML Group’s standards with regard to bribery and corruption as well as procedures to report and discuss incidents and situations where suspicions of bribery and corruption arise.