



# INTEGER WEALTH GLOBAL

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## Policy on Bribery and Corruption

Date: 20 June 2021

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### Policy Statement

Integer Wealth Global Group and all its member companies strive to deliver high-quality fund management, investment and related management services.

Within the tasks and procedures to reach a successful financial objective for clients, there are many high value transactions involved which may solicitate individual and/or clients to offer out-of-contract benefits to the stakeholders involved within such processes, and any undeclared benefit to any individual or corporate, business or any other entity is not accepted and is expanded on in the policy below.

Pre-determined legal commission structures and agreements are exempt from any course of action in this policy.

### 1. Purpose

This policy outlines Integer Wealth Global's commitment to preventing bribery and corruption in all its forms. It applies to all employees, directors, officers, and third parties acting on behalf of Integer Wealth Global and its member companies.

### 2. Scope

This policy applies to all operations of Integer Wealth Global, including its member companies, and covers all jurisdictions in which the company operates.

### 3. Definitions

- 3.1 Bribery:** Offering, giving, receiving, or soliciting anything of value to influence the actions of an official or other person in a position of authority.
- 3.2 Corruption:** Abuse of entrusted power for private gain, including bribery, fraud, embezzlement, and other unethical practices.



#### 4. Policy Statement

Integer Wealth Global has a zero-tolerance approach to bribery and corruption. We are committed to conducting business ethically and in compliance with all applicable laws and regulations, including the EU's anti-corruption framework.

#### 5. Legal Framework

This policy is designed to comply with the following EU regulations and directives:

- 5.1 The 1997 Convention on the Fight Against Corruption Involving Officials of the EU or Officials of EU Countries.
- 5.2 The 2003 Council Framework Decision on Combating Corruption in the Private Sector.
- 5.3 Directive (EU) 2017/1371 on the Fight Against Fraud to the Union's Financial Interests by Means of Criminal Law.
- 5.4 Regulation (EU, Euratom) 2020/2092 on a General Regime of Conditionality for the Protection of the Union Budget.
- 5.5 The 5th and 6th Anti-Money Laundering Directives.

#### 6. Prohibited Conduct

- 6.1 **Bribery:** Employees and associated persons must not offer, promise, give, request, or accept bribes.
  - 6.1.1 *Example:* Offering money or gifts to a government official to secure a contract.
  - 6.1.2 *Example:* Accepting a lavish gift from a supplier in exchange for preferential treatment.
- 6.2 **Facilitation Payments:** Small payments made to expedite routine government actions are prohibited.
  - 6.2.1 *Example:* Paying a customs official to speed up the clearance of goods.

#### 7 Gifts and Hospitality: Must be reasonable, proportionate, and not intended to influence business decisions.

- 7.1 *Example:* Giving or receiving expensive gifts or hospitality that could be perceived as a bribe.
- 7.2 *Example:* Offering tickets to a major sporting event to a potential client during contract negotiations.



## 8 Conflicts of Interest: Must be declared and managed appropriately.

- 8.1 *Example:* An employee awarding a contract to a company owned by a close family member without proper disclosure.

## 7. Responsibilities

- 7.1 **Employees:** Must adhere to this policy and report any suspected bribery or corruption.
- 7.2 **Management:** Responsible for implementing and enforcing this policy.
- 7.3 **Compliance Officer:** Oversees compliance with this policy and conducts regular audits.

## 8. Reporting and Whistleblowing

Employees are encouraged to report any concerns about bribery or corruption. Reports can be made anonymously and without fear of retaliation. The company will investigate all reports thoroughly.

## 9. Reporting Procedures for Violations

- 9.1 **Internal Reporting:** Employees should report any suspected violations of this policy to their immediate supervisor, the Compliance Officer, or through the designated whistleblowing hotline.
- 9.2 **Whistleblowing Hotline:** A confidential hotline is available for employees to report concerns anonymously. The hotline number is [hotline number].
- 9.3 **Written Reports:** Employees can also submit written reports to the Compliance Officer at [contact details].
- 9.4 **Investigation Process:** All reports will be promptly and thoroughly investigated by the Compliance Officer or an appointed investigator. The findings will be documented, and appropriate action will be taken.
- 9.5 **Protection Against Retaliation:** Employees who report concerns in good faith will be protected from retaliation. Any form of retaliation against whistleblowers is strictly prohibited and will result in disciplinary action.

## 10. Training and Awareness

All employees will receive regular training on anti-bribery and corruption laws and this policy. Training will be tailored to the risks associated with their roles.



## 11. Monitoring and Review

This policy will be reviewed annually and updated as necessary to ensure compliance with legal requirements and best practices.

## 12. Consequences for Violations

Violations of this policy will result in serious consequences, including but not limited to:

- 12.1 **Disciplinary Action:** Employees found to be in violation of this policy may face disciplinary actions, up to and including termination of employment.
- 12.2 **Legal Action:** Violations may also result in legal proceedings, including criminal charges, fines, and imprisonment.
- 12.3 **Reputational Damage:** Engaging in bribery or corruption can severely damage the reputation of Integer Wealth Global and its member companies, leading to loss of business and trust.

## 13. Consequences for Clients Engaging in Bribery and Corruption

Integer Wealth Global expects its clients to adhere to the same high standards of integrity and ethical conduct. If a client is found to be engaging in bribery or corruption, the following actions may be taken:

- 13.1 **Termination of Relationship:** The business relationship with the client may be terminated immediately.
- 13.2 **Reporting to Authorities:** The incident may be reported to relevant regulatory and law enforcement authorities.
- 13.3 **Legal Action:** Integer Wealth Global reserves the right to pursue legal action against the client for any damages incurred as a result of their actions.
- 13.4 **Reputational Consequences:** Public disclosure of the client's unethical behaviour may be made, which could harm their reputation and business prospects.

## 14. Contact Information

For further inquiries or detailed explanations regarding this policy, clients are encouraged to contact our Chief Liaison Officer at [info@integerwealth.global](mailto:info@integerwealth.global) or the legal officer at [legal@integerwealth.global](mailto:legal@integerwealth.global).