



ANTI-CORRUPTION AND BRIBERY POLICY

1. KKCG Group absolutely rejects corruption in all its forms. KKCG Group expects its employees and officers, business partners and customers to act ethically and to demonstrate honesty, integrity and fairness in all aspects of their business dealings. We do this because we recognise the harmful effect that corruption has on our business, our employees and our communities.
2. KKCG Group complies with the laws of the countries in which we operate. It is important that we do not break the applicable laws or international treaties and are not perceived as breaking them.
3. Most forms of corruption are a criminal offence in the countries in which we do business. Individuals who offer or receive bribes can be sentenced to long imprisonment terms in most countries in the world. Additionally, many countries have laws which make it an offence for their citizens to give or receive bribes, even if the bribery takes place overseas. In many countries, both individual employees and officers and KKCG Group companies can be prosecuted for misconduct.
4. The damage to our reputation, the disruption to our business, and the legal/financial costs of addressing allegations of corruption can be huge.
5. KKCG Group absolutely prohibits:
 - a) giving bribes to anyone;
 - b) taking bribes from anyone;
 - c) suggesting, proposing, requesting, offering, brokering or handling bribes; or
 - d) using other people to do any of the above things.
6. In simple terms, a bribe is anything given to someone to induce or reward the improper performance of a function or activity.
7. A bribe can take any form: it can be cash, bank transfers, physical goods, hospitality, travel, services, political donations, charitable donations, or employment. For example, paying for someone to go on holiday can be a bribe.
8. It does not matter whether the person who is improperly performing their function or activity is the same person who receives the bribe. For example, offering someone's relative a job in return for improper performance of their function is still a bribe and is prohibited.
9. It does not matter whether the person receiving the bribe is a government official or not. Bribery of private business people is also prohibited.
10. It does not matter whether the person receiving the bribe is being rewarded for doing their job (so-called "grease payments" or "facilitation payments"). Such payments are almost invariably unlawful under local law, and are prohibited by KKCG Group.

11. KKCG Group companies make political and charitable donations only with proper approval. You should read the KKCG Group Charitable Donations Policy and the KKCG Group Political Donations Policy for more information on this.
12. Providing gifts, hospitality and travel to non-employees and receiving them from other people is sometimes appropriate in the normal course of doing business. However, we must be careful that these are not excessive and do not lead to a perception that we are engaging in corrupt conduct. We do not provide gifts, hospitality or travel to public officials unless this has been approved in advance by the Legal Counsel or Compliance Officer of the relevant KKCG Group company. You should read the KKCG Group Gifts and Hospitality for more advice on this topic.
13. Third parties who play a role in our business (including joint venture partners, subcontractors, suppliers and agents) must not engage in corruption on our behalf. KKCG Group will conduct reasonable due diligence on these third parties before engaging them: you should read the KKCG Group Agents, Intermediaries and Joint Ventures Policy for more information on this.
14. Anti-bribery procedures will be built into mergers & acquisitions activity, including the deal development, due diligence, acquisition, and post-acquisition integration phases.
15. Employees and officers who think that corruption is occurring in relation to KKCG Group business must immediately inform their Line Manager, the Legal Counsel or Compliance Officer of the relevant KKCG Group company, the General Counsel or the Compliance Officer of KKCG Group, or send an email describing the concern to compliance@kkcg.com. You can also take advantage of the anonymous whistleblowing channels identified in KKCG Group's Whistleblowing Policy. The Whistleblowing Policy also explains how KKCG Group will respond to these concerns.
16. KKCG Group will train its employees and officers on anti-corruption issues on a risk-sensitive basis. KKCG Group will promote awareness of this policy and the value of anti-corruption to its employees and directors on a regular basis.
17. This policy applies to all KKCG Group companies. All employees and officers of KKCG Group companies must comply with this policy. Breach of this policy may result in disciplinary action. The specific requirements imposed by the relevant anti-bribery and corruption regulations may differ in each country in which KKCG Group operates. It is therefore important that you also read the relevant policies applicable to your relevant KKCG Group company and that you comply with the relevant regulatory requirements in your country.

If you are uncertain about how to behave in a specific situation, or if you think we are not living up to our KKCG Group Values, you should share your concerns promptly. You can speak to your Line Manager, the Compliance Officer or the Legal Counsel of the relevant KKCG Group company, the Compliance Officer or the General Counsel of KKCG Group or you can send an email to compliance@kkcg.com.