



UniLink Finance Ltd (“UFL”)

Anti- Bribery and Anti Corruption Policy

Introduction

UFL values its reputation for ethical behaviour and for financial probity and reliability and has a zero tolerance approach on all forms of bribery or inducement.

It recognises that over and above the commission of any crime, any involvement in bribery will also reflect adversely on its image and reputation. Its aim therefore is to limit its exposure to bribery by:

- Setting out a clear Anti Bribery & Corruption policy;
- Training 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 channels of communication and ensuring sensitive information is treated appropriately;
- Rigorously investigating instances of alleged bribery;
- Taking firm and proportionate action against any individual(s) involved in bribery.

UFL absolutely forbids corruption and the paying or receipt of bribes for any purpose.

The Policy

Bribery - Bribery is the offering, promising, giving, solicitation or the receipt or agreement to receive any financial or other advantage, or any other inducement from any person or company, (wherever they are situated and whether they are a public official or body, or a private person or company) by an individual employee, agent or other person or body acting on another’s behalf.

Corruption – Corruption is the abuse of entrusted power for a private gain.

UFL prohibits:

Bribery of or by any person or company, wherever they are situated and whether they are a public official or body or private person or company or by any individual employee, agent or other person or body acting on UFL's behalf in order to

- (1) gain any commercial, contractual or regulatory advantage for UFL in a way which is unethical or
- (2) gain any personal advantage, pecuniary or otherwise, for the individual or anyone connected with the individual or

- (3) induce the improper performance of any function that is of a public nature, connected with a business, performed by a body or performed by a person in the course of their employment.

When acting for UFL, political contributions are not allowed and charitable contributions are allowed only within agreed UFL schemes and guidelines.

Facilitation payments are any payment made (except where comprised in a lawful and published tariff of general application) as an inducement to secure or expedite a routine or necessary action to which the payer of the facilitation payment has a legal entitlement. These are not legal under the Bribery Act 2010. These are not permitted or condoned by UFL.

Further Clarification

This policy is not meant to prohibit the following practices providing they are customary in its particular market, are proportionate and are properly recorded:

- normal, reasonable, transparent and appropriate hospitality
- the giving of a ceremonial gift on a festival or at another special time
- the use of any recognised fast-track process which is available to all on payment of a fee.

This policy will be updated by the Board on an annual basis.

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