

# Agrofertrans Group Policy: Anti-Corruption & Bribery Policy

## Introduction

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Corruption and bribery are both illegal and unethical. They destabilise communities, undermine the rule of law, and pose serious threats to sustained economic progress and the healthy operation of markets. Failure to address the risk of corruption and bribery may undermine our reputation and lead to investigations, fines and/or other penalties for the company and/or individuals.

We do not engage in corruption and we never pay bribes, regardless of local custom or practice. Agrofertrans' position on corruption is clear: the offer, payment, authorisation, solicitation and acceptance of bribes and other improper advantages are unacceptable.

This Anti-Corruption and Bribery Policy sets out Agrofertrans' approach to the prevention of bribery and other forms of corruption.

## Who does this apply to?

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This policy applies to all employees, directors and officers, as well as contractors under Agrofertrans' direct supervision, working for an Agrofertrans office or industrial asset directly or indirectly controlled or operated by Agrofertrans worldwide.

We ensure that joint ventures under our control to act in a manner consistent with the intent of this policy.

## What is our commitment?

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We do not tolerate bribery of any kind, whether to a public official or a private individual.

We never offer, provide or authorise bribes of any kind, including facilitation payments, either directly or indirectly, to a public official or a private individual.

We never request or accept bribes of any kind, either directly or indirectly. A bribe may be monetary or non-monetary, tangible or intangible. A bribe may take the form of, or be facilitated through:

- payments of money
- gifts or entertainment
- discounts, loans and/or financing given on non-commercial terms
- rebates or kickbacks in relation to services provided
- overpayments to business partners
- use of assets at a discount or free of charge
- sponsorships, charitable contributions and community investments
- political contributions
- employment or internships, or
- information assistance.

To manage our bribery and corruption risk, we follow a range of procedures and controls relating to dealings with public officials, gifts and entertainment, our business partners, sponsorships and donations, political contributions and record keeping.

We remain alert to corruption and bribery red flags and report them to Compliance.

### Public officials.

Dealing with public officials brings a higher risk of corruption or the perception of corruption. We are especially careful when communicating with public officials and seeking for assistance of public officials.

### Facilitation payments.

In certain jurisdictions, public officials may request small payments, known as facilitation payments to expedite or to secure the performance of a routine governmental action such as issuing permits, licenses, or other official documents; processing government papers such as visas; providing customs clearances; providing police protection; providing utility services; or handling cargo. Facilitation payments are a form of bribery. We never pay or authorise the payment of facilitation payments.

### Gifts and entertainment.



**AGROFERTRANS**

The proper management of the giving and acceptance of gifts and entertainment is key to avoiding the risk of actual or perceived bribery or corruption they present.

We only give or accept gifts and entertainment that are:

- in good faith, occasional, reasonable and appropriate
- a normal business courtesy, and
- transparent.

We don't give or accept gifts and entertainment:

- with the intent or prospect of influencing decision-making or other conduct
- with the intent obtaining any improper or undue advantage
- which are reasonably capable of being regarded in any way as a bribe, or
- in the form of cash, which includes pre-paid cards or gift cards which can be redeemed for cash.

### **Sponsorships, charitable contributions, and community investments.**

We never make a sponsorship, charitable contribution, or community investment in order to disguise a bribe, or to gain an improper business advantage.

We ensure that before we enter sponsorships, community investments or make charitable contributions we conduct risk-based due diligence. We monitor the appropriate use of our funds or resources when required.

### **Political contributions.**

We do not seek to influence the political process by improper or corrupt means. To mitigate this risk, we do not contribute any funds or resources towards any political campaign, political party, political candidate or any politically affiliated organisation.

### **Business partners.**

We expect our business partners to share our commitment to ethical and responsible business practices. We never authorise a business partner to engage in bribery or corruption on our behalf.

We take care to know who our business partners are.

To manage our bribery and corruption exposure associated with our business partners, we follow a range of controls and processes including screening, due diligence and monitoring, using a risk-based approach. We implement additional controls with regards to high-risk business partners, such as business developers, joint venture partners, lobbyists, consultants or advisers interacting with public officials on our behalf. We conduct a detailed risk-based assessment prior to entering into these types of relationships, to enable us to identify, assess and mitigate the corruption risk presented by the engagements. Where appropriate, we also conduct ongoing monitoring and regular review of our high-risk business partner relationships.

### **Mergers and acquisitions.**

When considering entering a merger or acquisition, we conduct risk-based due diligence to understand any bribery and corruption risks associated with the transaction and take steps to address any identified issues. Where we acquire the right to control or operate a business, we promptly implement this policy, associated procedures and controls.

### **Accurate record keeping.**

We ensure all transactions are accurately recorded in Agrofertrans' books and records in accordance with our procedures and reflect the nature and substance of the transaction.

### **Speaking openly**

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We are each responsible for ensuring that we meet our commitments. We expect our employees and contractors to speak openly and raise concerns about possible breaches of this policy with their manager, supervisor or via other available reporting channels. Agrofertrans takes concerns seriously and handles them promptly.

Agrofertrans has zero tolerance for retaliation against anyone who speaks openly about conduct they believe is unethical, illegal or not in line with our policies, even if the concern isn't substantiated, as long as they have not knowingly made a false report.



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## Consequences

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Agrofertrans takes breaches of our policies seriously. Consequences for breaching this policy depend on the severity of the breach but may range from a warning to termination of employment. In certain instances, there may also be civil and/or criminal liability.

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## Key Terms

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BRIBE	Anything of value, including any financial or other advantage, offered, provided, authorised, requested or accepted in order to improperly influence any person's action, inaction or decision, whether the person is a public official or a private individual.
CORRUPTION	The abuse of power or position for personal gain.
GIFTS	Any items of value or benefits exchanged at no cost.
ENTERTAINMENT	Any activity offered or received for free - or at less than market price - including (but not limited to) meals, travel, accommodation, sporting events, recreational activities and hospitality.
FACILITATION PAYMENT	Any payment, however small, to expedite or to secure the performance of a routine governmental action.
PUBLIC OFFICIAL	An officer, employee or representative of a state or a state-controlled or -owned entity, which includes: <ul style="list-style-type: none"><li>- any officer, employee or representative of any national or local government institution</li><li>- any person holding a legislative, administrative or judicial position of any kind</li><li>- any officer, employee or representative of a public international organisation such as the United Nations, or World Bank</li><li>- any officer, director, employee or representative of any state-owned or -controlled enterprise or company</li><li>- any officer or representative of a political party, or</li><li>- any candidate for a political office</li></ul>

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