

Anti-Bribery, Corruption and Fraud Policy

1 BACKGROUND AND OBJECTIVES

This policy applies to all employees at RiskPoint Group (the “Company”) on a global basis. The objective of this policy is to state the requirements for business practices and personal conduct within the Company. Bribery and corruption undermine legitimate activities, distort competition, ruin reputations and expose the Company and individuals to risk.

The Company recognises that corruption and other unethical practices undermine the support and confidence of its business environment, which is key to its business success. In support of these principles, the Company has developed this policy for countering corruption, bribery and other unethical behaviour.

If applicable laws and regulations require higher standards than this policy, such standards must be followed.

2 COMBATING BRIBERY AND CORRUPTION

Bribery is the receiving of or offering/giving of any benefit (in cash or kind) by or to any public servant or office holder or to a director or employee of a private company in order to induce that person to give improper assistance in breach of their duty to the government or company which has appointed them.

Corruption is the abuse of public or private office for personal gain or other similar improper conduct where the person, their relatives/contacts or businesses benefit from receipt of a bribe, kick back or other illegal activity.

The Company has a zero tolerance policy against bribery and corruption and will exercise all due efforts to secure that these do not occur in the course of its business activities.

3 COMMON TYPES OF BRIBERY

A kick back is a form of bribery between private entities made with the intention of improperly winning a tender for a contract. In this situation, the person awarding the contract or order does not award it to the best bid or proposal, but rather to the payer of the kickback. A kickback is illegal even if the paying company presented the best bid and would have won the contract without the kickback.

The Company will not pay or promise to pay any kickback in exchange for contracts/orders being awarded to a specific supplier. Furthermore, the Company will not promise, solicit, give or receive any advantage that can be seen to be in connection with the awarding of a contract, regardless of whether such advantage is exchanged before or after the contract has been awarded.

For the avoidance of doubt, the payment of normal market brokerage is not a kick back. Business entertainment in accordance with the Gift and Hospitality Policy is not bribery.

Facilitation payments are a form of bribery made with the purpose of expediting or facilitating the performance by a public official of a routine governmental action, and/or expediting or securing the provision of products or services to which the Company has a rightful claim.

RiskPoint Group is against facilitation payments and will actively oppose them if/when we meet them. The fact that corruption is a common practice in a given country does not make it legal.

4 POLITICAL AND CHARITABLE CONTRIBUTIONS

Political contributions are financial or other kinds of support given to political parties and political campaign efforts, whereas charitable contributions are defined as contributions made to charitable causes or organisations.

The Company does not support individual political parties or individual politicians. Company employees may participate in democratic political activities, provided that this is without any reference to or in connection with their employment.

Charitable contributions and community support as well as donations, e.g. knowledge, services exchange, or direct financial contributions are acceptable, provided that such donations are not given with the intention of obtaining or retaining business or any other undue advantage.

This policy does not prohibit appropriate hospitality nor the giving of gifts, provided they are in accordance with the Gift and Hospitality Policy.

5 COMBATING FRAUD

Fraud comprises both the use of deception to obtain an unjust or illegal financial advantage and intentional misinterpretations. The following actions are among those which fall within the definition of fraud (non-exhaustive):

- Theft of company property, including information
- False accounting – dishonestly destroying, concealing or falsifying any account, record or document required for any accounting purpose
- Misappropriation or use of company assets for personal gain
- Forgery or alteration of company documents
- Wilful destruction or removal of company records
- Knowingly generating or paying false claims or invoices

The Company is committed to developing an anti-fraud culture and actively seeks to deter and prevent fraud and corruption by ensuring that risks are identified and managed effectively. RiskPoint Group will not accept any level of fraud and will investigate all suspected cases.

6 POLITICALLY EXPOSED PERSONS (PEP'S)

PEP's are ideal targets for bribery and corruption, because they have vital information. If an organisation is going to communicate and conduct business with a PEP, they need to do so fairly and lawfully, complying with applicable bribery regulation.

PEP's can pose a risk to organisations through bribery, corruption and money laundering. Employees within RiskPoint Group need to take appropriate measures when issuing insurance to or covering PEP's, by undertaking thorough risk assessment, determining underlying beneficial ownership/control, structures, etc. to evaluate whether or not to bind the risk in risk of financial crime exposure.

7 REPORTING

Any RiskPoint Group employee who becomes aware that any bribery, fraud, attempt of bribery, corruption or fraud by or with respect to the Company and its business has taken place, shall report this immediately to the Director of Finance & Operations or through the Whistleblower reporting channel. The Director of Finance & Operations is responsible for logging reports in the **Financial Crime log for Bribery, Corruption and Fraud cases.**

8 SANCTIONS / PENALTIES

No Company employee will be penalised or subject to adverse consequences for refusing to pay bribes, even if doing so may cause a loss of business or any other negative consequence. Additionally, no employee will be penalised for raising questions about or reporting on unethical behaviour or corruption.

Failure to observe this policy is a cause for disciplinary action, including dismissal or summary dismissal. Cases may be reported to the relevant authorities, where failure to comply with bribery regulations can result in penalties including imprisonment.

9 COMPLIANCE AND MONITORING

Company management will regularly review and update this policy and monitor its observance by employees as well as and third part business partners acting on our behalf.

It is the responsibility of Company management to communicate this policy and ensure that all employees and external parties working on behalf of the Company understand and comply with the aim of this policy.

10 COMMUNICATIONS AND TRAINING

Company employees are obliged to complete the Lloyds Coverholders - Financial crime prevention through E-Learning on Proceeds of Crime including Money Laundering, Sanctions and Bribery. All employees are obliged to maintain their knowledge by completing the E-learning training every 2 years.

Version: 2

Dated: July 11th 2024