



# **Anti-Bribery & Corruption Policy**

## 1. Introduction

Corruption and bribery are illegal and unethical. They de-stabilise communities, undermine the rule of law, and pose serious threats to economic progress and the healthy operation of markets. We do not engage in corruption, and we never pay bribes, regardless of local customs or practices. Accelerate's position on corruption is clear: the offer, payment, authorisation, solicitation, and acceptance of bribes and other improper advantages is unacceptable. This Anti-Corruption and Bribery Policy sets out our approach to the prevention of bribery and other forms of corruption.

## 2. Scope

This policy applies to all Accelerate directors, employees, officers, as well as contractors under Accelerate's direct supervision.

## 3. Our commitment

- 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
- We never request or accept bribes of any kind
- To manage our bribery and corruption risk, we implement a range of procedures and controls relating to dealings with clients, partners, suppliers, sponsorships, donations, and record keeping.

### 3.1 Gifts & Entertainment

We only give or accept gifts and entertainment that are:

- In good faith, occasional, reasonable, and appropriate
- A normal business courtesy
- Transparent.

We don't give or accept gifts and entertainment:

- With the intent or prospect of influencing decision-making
- With the intent of obtaining any improper advantage
- In the form of cash, which includes pre-paid cards or gift cards which can be redeemed for cash

### 3.2 Sponsorships, Charitable Contributions & 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 conduct risk-based due diligence before we enter into any such activity.

### **3.3 Political & Religious Contributions**

We do not seek to influence the political process; therefore, we do not contribute any funds or resources toward any political party, candidate, or affiliated organisation.

We do not seek to influence, or become involved in, religious organisations; therefore, we do not contribute any funds or resources towards any religious organisation.

### **3.4 Partners & Suppliers**

We expect our partners and suppliers to share our commitment to ethical and responsible business practices. We never authorise a business partner or supplier to engage in bribery or corruption on our behalf. To manage our bribery and corruption exposure associated with business partners and suppliers, we implement a range of controls through our onboarding process including screening and due diligence, with ongoing monitoring.

### **3.5 Accurate Record Keeping**

We ensure all transactions are accurately recorded in Accelerate's books in accordance with our accounting procedures.

## **4. Policy Review Process**

Accelerate is committed to continually review and improve all of our policies, and may make changes at any point. At the very least, all policies are reviewed annually and will be issued to all Accelerate directors, employees, officers, as well as contractors under Accelerate's direct supervision ("Colleagues").

## **5. Enforcement & Consequences**

Non-conformance or breach by any colleague or third-party members will be subject to investigation and may lead to disciplinary actions, up to and including termination of employment/contract.

#### **Related Policies**

Contract of Employment

Accelerate Terms & Conditions



## Version Control

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