

## ANTI BRIBERY POLICY

### Bribery Act 2010 - Arrangements in place

EFT Group Ltd. have communicated the implications of the Bribery Act 2010.

We recognise that what may have been custom and practice many years ago is now governed by procurement regulation, but more importantly, ethics and integrity.

EFT Group Ltd. has implemented the following arrangements:

- We have made our guidelines clear and accessible to our employees who are in a controlling or influencing position.
- We have established a zero-tolerance culture regarding bribery and corruption, and we ensure that all employees, and those that we do business with, are fully aware of our anti-corruption and bribery policies

### Communicating our Policy

**We communicate our arrangements at a number of stages to ensure and demonstrate our commitment and diligence in this area:**

- 1. Recruitment:** We carry out additional background checks and vetting during the recruitment process.
- 2. Inductions:** We include training on the Company's anti-corruption and bribery policies and procedures for all employees and workers.
- 3. Expenses:** We carry our regular audits and ensure there is evidence as to how and why money was spent for each expense claim submitted.
- 4. Hospitality:** We have created a Hospitality Policy, including clear guidance on both the giving and receiving of gifts.
- 5. Disciplinary Procedures:** We have amended our disciplinary policies and procedures to make it clear that any breach of the Company's anti-corruption and bribery policies (and related policies) may amount to gross misconduct.
- 6. Bonus and Commission Schemes:** We have reviewed our schemes to ensure that, as far as possible, we do not unintentionally encourage employees to ignore bribery and corruption risks.
- 7. Whistleblowing:** We have set up a comprehensive and up-to-date Whistleblowing Policy. All workers are made aware of its existence, understand how it applies and are given access to a copy.
- 8. Investigating Potential Breaches:** We ensure that every incident of a suspected breach is investigated and documented. All investigations will be fair and confidential.
- 9. Discrimination:** We ensure that any anti-corruption and bribery policies and procedures are not based on racial stereotyping of certain nationalities.

Signed on behalf of the Board of Directors:



Position: **CEO**

Date: 01/01/2021