



ANTI-BRIBERY & ANTI-CORRUPTION POLICY

Trusted Partners is an Environmental & Social Risk Management advisory firm delivering ESG, sustainability and risk and impact management services across Africa and, where required, internationally. Our credibility as advisors depends on professional integrity, sound governance and consistent ethical conduct. Bribery and corruption undermine legitimate business activity, distort decision-making, create material legal and reputational exposure, and are incompatible with **Trusted Partners'** values and professional standards.

Trusted Partners' operating model relies on trusted relationships with clients, counterparties, public authorities and communities across multiple jurisdictions. This can create elevated integrity risks, including exposure to public procurement processes, licensing and permitting interfaces, facilitation pressure, third-party reliance and high-stakes commercial decision-making. This Policy therefore sets out **Trusted Partners'** commitments, minimum standards and operational expectations for preventing bribery and corruption in all aspects of our work.

This Policy must be read and implemented alongside applicable laws, contractual obligations, and any related internal controls (including finance/expense approval procedures and procurement processes). Where local law, client requirements or contractual terms impose higher standards than this Policy, **Trusted Partners** and its Representatives must comply with the higher standard.

1 Policy Statement

Trusted Partners adopts a zero-tolerance approach to bribery and corruption. We are committed to conducting business ethically, transparently and in full compliance with all relevant laws and standards in the jurisdictions where we operate.

Trusted Partners supports international efforts to prevent bribery and corruption and is committed to complying with applicable requirements including, as relevant to our operations and counterparties:

- The UK Bribery Act 2010;
- The US Foreign Corrupt Practices Act (FCPA); and
- Applicable laws of the Republic of South Africa and other jurisdictions in which we deliver services.

Trusted Partners will take reasonable, risk-based steps to prevent bribery and corruption, including proportionate due diligence on clients, suppliers, partners and other third parties, and clear expectations for ethical conduct. The purpose of this Policy is to:

- a) Define responsibilities and minimum standards for preventing bribery and corruption;
- b) Provide guidance on identifying, avoiding and responding to bribery and corruption risks; and
- c) Protect **Trusted Partners**, its Representatives and counterparties from legal, financial and reputational harm.

2 Who is covered by this Policy

This Policy applies to all **Partners**, Associate Partners, employees, secondees, associates, sub-consultants and sub-contractors of **Trusted Partners** (together, “Representatives”), irrespective of engagement type, seniority, location or working arrangement. The requirements of this Policy apply at all times and across all activities undertaken for or on behalf of **Trusted Partners**, including business development and client engagement, tendering and procurement processes, contracting and project delivery, fieldwork and travel, invoicing and financial transactions (including expense claims and payments), and all dealings with government or public officials, regulators and other authorities.

For the purposes of this Policy, a “third party” means any individual or organisation with whom **Trusted Partners**, or any Representative acting on its behalf, interacts in the course of **Trusted Partners**’ work. This includes, without limitation, clients, customers, suppliers, service providers, agents, intermediaries, contractors, sub-contractors, joint venture and consortium partners, public authorities, and community or stakeholder representatives.

3 Bribery and corruption risk in our operations

Trusted Partners’ work may involve engagements and interfaces where decisions are sensitive, time-critical and subject to external influence, including permitting and licensing processes, access and stakeholder arrangements, procurement and tendering, audit and verification activities, regulatory engagement, and approval pathways. Representatives must remain vigilant to the possibility that bribery and corruption risks can arise in these contexts, including through requests for “speed money”, “facilitation” or unsupported “administration fees”; pressure, direct or indirect, to provide gifts, hospitality or other benefits to influence outcomes; the use of intermediaries or third parties to improperly obtain contracts, favourable treatment or approvals; conflicts of interest, undisclosed relationships or improper referral or commission arrangements; and the creation or maintenance of inaccurate, incomplete or misleading records intended to conceal improper payments or benefits.

Trusted Partners requires Representatives to apply risk-based judgement and conservative decision-making at all times, to avoid conduct that may create actual or perceived impropriety, and to escalate concerns promptly through appropriate internal channels.

4 Definitions: bribery and corruption

A bribe is an inducement, payment, reward or benefit offered, promised, given, requested or received to obtain or retain a commercial, contractual, regulatory or personal advantage.

Corruption is the abuse of entrusted power for private gain, including misuse of public office or private authority in a business context.

Bribery and corruption can take many forms, including (without limitation):

- Direct or indirect payments, commissions or “kickbacks”;
- Gifts, hospitality or travel not proportionate or not for bona fide purposes;
- Facilitation payments;
- Donations or sponsorships used to influence decisions; and
- Employment or contracting offered as an improper benefit.

Bribery and corruption may involve employees, directors, third parties, intermediaries, or public officials (domestic or foreign).

5 Gifts, hospitality and business courtesies

Trusted Partners recognises that reasonable gifts, hospitality and promotional expenditure may occur in the ordinary course of legitimate business relationships and is not prohibited, provided such courtesies are modest, proportionate and justifiable, are offered or received openly and transparently, are properly authorised where required and accurately recorded, and are demonstrably for bona fide business purposes. Under no circumstances may gifts, hospitality or promotional expenditure be used, or appear to be used, to influence decision-making, to secure or retain business, or to obtain, reward or acknowledge any improper advantage.

Gifts/hospitality may only be given or received if all of the following apply:

- a) There is no intention (explicit or implicit) to influence a decision or obtain/retain business improperly;
- b) It complies with local law and client rules (where applicable);
- c) It is provided in the name of **Trusted Partners** (not personally);
- d) It does not include cash or cash equivalents (vouchers, gift cards, etc.);
- e) It is appropriate to context and timing;
- f) It is offered openly, not secretly; and
- g) No gifts/hospitality may be offered to or accepted from public officials, politicians or political parties without prior written approval from the **Partners** (registered Directors).

5.1 Monetary threshold and approvals

Trusted Partners applies a defined monetary threshold to ensure that gifts and hospitality remain proportionate, transparent and free from any perception of improper influence. Any gift or hospitality with a value exceeding R2,500 per person per event (or an equivalent/comparable value in another jurisdiction) may only be offered or accepted with the prior written approval of a **Partner**. All gifts or hospitality above R2,500 that are offered or accepted must be declared and recorded in the Company's gifts register (or, where a register is not immediately accessible, notified by email to a **Partner**) as soon as reasonably practicable.

5.2 Comparable value

In assessing whether a gift or hospitality is of comparable value in another country or context, Representatives must apply reasonable judgement, taking into account relevant circumstances such as local income levels, customary business practice and the nature of the relationship. However, custom, practice or local norms do not override this Policy, and the requirement for approval, transparency and accurate recording remains mandatory.

6 What is not acceptable

It is not acceptable for any Representative (directly or indirectly) to:

- a) Give, promise, offer or authorise any payment, gift or hospitality with the expectation that a business decision will be influenced or an improper advantage obtained;
- b) Give, promise, offer or authorise any payment or benefit to a public official to facilitate or expedite routine action;
- c) Accept any payment or benefit where there is knowledge or suspicion it is intended to influence **Trusted Partners'** decision-making improperly;
- d) Request, solicit or encourage any improper benefit;
- e) Threaten or retaliate against anyone who refuses to participate in bribery/corruption or who raises concerns; or
- f) Engage in any conduct that could lead to a breach of this Policy.

7 Facilitation payments and kickbacks

Trusted Partners does not make, authorise or tolerate facilitation payments or kickbacks, and will not accept any such payments or benefits in any form. Facilitation payments are typically small, unofficial payments made to secure or expedite routine government action. Kickbacks are payments or other benefits provided in return for a business favour, preferential treatment or improper advantage.

Where any payment is requested, suggested or implied in circumstances that may indicate a facilitation payment or kickback, Representatives must refuse the request and clearly state that **Trusted Partners** is prohibited from making or receiving such payments. Representatives must also require that any legitimate fee be supported by a formal invoice or receipt and a clear written basis for the charge and must immediately escalate the matter to the Project Lead and/or a **Partner**.

Exception – duress and personal safety: If a facilitation payment is extorted under duress or there is a credible and immediate threat to personal safety, a payment may be made only as a last resort to protect life or physical security. In such circumstances, the Representative must inform a **Partner** as soon as it is safe to do so, submit a written incident report, and ensure that the payment is fully and accurately recorded in **Trusted Partners**' financial records, supported by all available details and documentation.

8 Responsibilities and expected behaviour

Compliance with this Policy is a condition of appointment and/or engagement. All Representatives are required to read, understand and adhere to the requirements set out herein, and to conduct themselves at all times in a manner consistent with **Trusted Partners**' zero-tolerance approach to bribery and corruption. Accordingly, every Representative has an affirmative duty to act with integrity and to:

- a) Avoid any conduct, arrangement or interaction that could create, enable or be perceived to create bribery or corruption risk;
- b) Apply prudent, conservative judgement in higher-risk contexts, including where decision-making is sensitive, discretionary, time-critical or influenced by third parties;
- c) Comply fully with **Trusted Partners**' expense, procurement, contracting and financial control procedures, ensuring that approvals, documentation and records are complete, accurate and transparent;
- d) Ensure that third parties acting under their direction or control are made aware of, and operate in accordance with, applicable anti-bribery and anti-corruption requirements; and
- e) Raise and escalate concerns promptly through appropriate internal channels, including where a request, expectation or circumstance may indicate improper influence or non-compliance.

9 Record keeping and internal controls

Trusted Partners must keep accurate financial records and maintain appropriate internal controls that evidence the business rationale for payments to third parties.

Representatives must ensure:

- Gifts/hospitality above the threshold are declared and recorded;
- Expense claims are submitted in accordance with internal requirements and accurately describe the purpose of expenditure; and
- All accounts, invoices, memoranda and records are complete, accurate and not misleading.

Accounts may not be kept “off-book” or in any way used to conceal improper payments.

10 Raising concerns and protected disclosures

Trusted Partners promotes a culture of openness and accountability and encourages the early reporting of concerns. Where a Representative is uncertain whether a particular act, request or circumstance may constitute bribery or corruption or has any question regarding the interpretation or application of this Policy, the matter must be raised promptly with a **Partner** for guidance and, where necessary, appropriate action.

Concerns should be reported as a protected disclosure where applicable. **Trusted Partners** will treat reports seriously and in good faith, and statutory whistle-blower protections may be available under relevant local law.

11 Protection from retaliation

Trusted Partners is committed to fostering an environment in which concerns can be raised openly and responsibly. The Company will support any Representative who raises a genuine concern in good faith, even where subsequent review determines that the concern was unfounded.

Trusted Partners will not tolerate retaliation. No Representative will suffer any detrimental treatment as a result of refusing to offer, authorise, solicit or accept a bribe, or for reporting suspected bribery or corruption in good faith. Detrimental treatment includes, without limitation, dismissal, disciplinary action, threats, intimidation, discrimination or any other unfavourable treatment connected with the raising of a concern.

Any Representative who believes they have been subjected to detrimental treatment must inform a **Partner** immediately so that the matter can be addressed promptly and appropriately.

12 Training and communication

Trusted Partners will provide proportionate awareness training and practical guidance to ensure that Representatives understand this Policy and are able to implement it effectively, taking into account the Company’s operating footprint, the nature of assignments, and evolving legal and client requirements.

Trusted Partners will also communicate its zero-tolerance approach to modern slavery to Representatives and, where appropriate, to suppliers, contractors, intermediaries and clients at the outset of engagements and thereafter as required, with particular emphasis in higher-risk jurisdictions, transactions or operational contexts.

13 Responsibility for the Policy

The **Partners** have overall accountability for ensuring that this Policy is effectively implemented, remains fit-for-purpose, and continues to meet **Trusted Partners’** legal, ethical and professional obligations across the jurisdictions in which the Company operates.

In addition, the **Partners** retain day-to-day responsibility for the governance and operation of this Policy, including providing authoritative interpretation and guidance, monitoring compliance and the adequacy of controls, receiving and responding to concerns and incidents, and driving

corrective and preventative improvements where gaps, weaknesses or recurring risks are identified.

14 Risk assessment, monitoring and review

Trusted Partners treats modern slavery risk as part of the Company’s overall governance and risk management approach. The **Partners** will periodically assess modern slavery risks relevant to the Company’s operating footprint, service lines and counterparties, and will monitor the effectiveness of this Policy.

This Policy does not form part of any employee contract of employment and may be amended by **Trusted Partners** at any time.

15 Policy review and effective date

This Policy is reviewed at least annually and additionally when material changes occur to **Trusted Partners’** operations, service lines, client requirements or applicable legal obligations. The most recent version remains in effect until formally updated and re-issued.

16 Contact

Questions regarding this Policy or concerns relating to modern slavery should be directed to the **Partners** through **Trusted Partners** official communication channels.

DATE OF APPLICABILITY		NEXT REVIEW	
March 01, 2026		February 28, 2028	

NAME	POSITION	DATE	SIGNATURE
Malcolme Logie	Partner	March 01, 2026	<i>Malcolme Logie</i>
Nishal Sewruttan	Partner	March 01, 2026	<i>Nishal Sewruttan</i>

https://www.TrustedPartners.Africa