

# ANTI-BRIBERY CORRUPTION (ABAC) POLICY STATEMENT

Garant Group conducts its business professionally, with integrity and in compliance with the laws of those jurisdictions in which it operates. Our reputation for acting fairly is built on our values as a company and the values of our employees. As part of our commitment to ethical business practices, we will not tolerate acts of bribery or corruption.

Most countries have laws that prohibit bribery and corruption. Garant Group's Anti-Bribery Policy, Anti-Malpractice Policy and Code of Labour Standards are not intended to supersede such local laws and regulations. They are intended to ensure that Garant Group personnel, and those acting on our behalf, behave in a manner that is consistent with anti-bribery and corruption laws in all countries in which Garant Group does business.

The Policies apply to all Garant Group employees (whether permanent or temporary), contractors, officers and directors of Garant Group, its subsidiaries and joint venture companies under Garant Group's control. Third parties acting on behalf of or in the name of Garant Group, including agents, representatives and other intermediaries, are required to act consistently with Garant Group's Anti-Bribery Policy. Joint venture companies not under Garant Group's control, and our joint venture partners, are encouraged to adopt a similar policy and procedures to prevent bribery.

**Garant Group operates a zero tolerance approach to bribery and corruption** in relation to bribes (payment, offer or promise to pay or provide anything of value), gifts and hospitality, facilitation payments (small payments or fees to speed up or facilitate the performance of routine action to which an entitlement already exists) and payments to government officials.

Third parties engaged to represent Garant Group's interests must comply with the principles set out in the **Anti-Bribery Policy**.

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The **Anti-Malpractice Policy** encourages employees and others working for the Company to assist in tackling any fraud, corruption and other malpractice within the organisation and in setting standards of ethical conduct.

The **Code of Labour Standards** guides our business relationships and provides a baseline for our ongoing review of ethical work standards

- Applying the Code directly with our employees and in businesses in which Garant Group has a controlling interest and / or has contractually mandated control over standards of operation.
- Seeking, in businesses in which Garant Group does not have control, to influence significant business partners and suppliers to adopt similar principles.
- Make third parties such as contractors, agents or consultants, aware of our Code of Labour Standards and include compliance as a consideration in our decision to award contracts.

Including, but not limited to, local employment requirements, ethical practices, safe working environments, freedom from discrimination, freedom from harassment, freedom of expression and association, forced labour, child labour and human trafficking, the Code reflects Garant Group's commitment to conduct its business professionally, with integrity and in compliance with the laws of those jurisdictions in which it operates.