

# Anti-bribery and Corruption Policy



CHRYSAOR

## 1.0 POLICY

Chrysaor is committed to maintaining the highest standards of integrity in the way it conducts business in the jurisdictions in which it operates. In order to maintain Chrysaor's core business values of Integrity, Safety, Innovation and Passion; ensure a safe and sustainable business; and protect its reputation:

- Chrysaor will comply with all relevant laws in the jurisdictions in which it operates.
- Chrysaor will not tolerate any form of bribery, corruption, fraud, misconduct or wrongdoing in its business dealings.
- Chrysaor employees, officers, directors, contractors, agency workers, temporary workers, joint venture partners, service providers, suppliers, vendors, agents, intermediaries, advisors and consultants are strictly prohibited from offering, paying, soliciting or accepting bribes or any form of kickback, including facilitation payments, in any circumstances and in any jurisdiction that Chrysaor operates in.
- Chrysaor will not make contributions to political parties or politicians in any country. Chrysaor will only make charitable donations that are legal and ethical under local laws and practices.

Adherence to this policy is subject to regular review by the General Counsel, Chrysaor. Chrysaor Legal will provide appropriate training for all relevant Chrysaor personnel regarding this policy. General Counsel, Chrysaor has responsibility for the day-to-day implementation of this policy; this includes monitoring its suitability, adequacy and effectiveness and putting in place appropriate business processes and procedures to ensure compliance with this policy and with all applicable laws in the jurisdictions in which Chrysaor operates.

## 2.0 APPLICATION

This policy applies to all Chrysaor business activity and to all Chrysaor employees, officers, directors, contractors, agency workers and temporary workers. Chrysaor joint venture partners, service providers, suppliers, vendors, agents, advisors, intermediaries and consultants are required to be aware of and act consistently with this policy.

## 3.0 REPORTING CONCERNS

Chrysaor is committed to maintaining a working environment and conducting its business in such a manner where concerns can be raised openly, are listened to and are promptly acted upon without fear of retaliation.

Any instances of wrongdoing (whether actual or suspected) relating to Chrysaor or its associates should be reported to the Chrysaor Compliance team through our dedicated email address ([Chrysaor.Compliance@chrysaor.com](mailto:Chrysaor.Compliance@chrysaor.com)) or through our external independent confidential *SeeHearSpeakUp* reporting service. The *SeeHearSpeakUp* service is available at any time of day by phone (UK - 0800 988 6818 or Norway - 800 15 838, email ([report@seehearspeakup.co.uk](mailto:report@seehearspeakup.co.uk)) or via web portal (<http://www.seehearspeak.co.uk/en/file-a-report>).

## 4.0 RETALIATION

Chrysaor does not tolerate retaliation in any form against any individual who speaks up in good faith, even if the concern is later determined to be factually incorrect or unfounded. Chrysaor treats all speaking up cases seriously and, when required, Chrysaor will initiate an investigation to determine the facts. Where Chrysaor consider it necessary, Chrysaor will inform the relevant authorities or law enforcement agencies.

**Phil Kirk**  
Chief Executive Officer  
30 January 2019