

# TRAKM8 ANTI-CORRUPTION POLICY

## Introduction

Trakm8 has a number of fundamental principles and values which it believes are the foundation of sound and fair business practise and as such are important to uphold. One such principle is a zero tolerance position in relation to corruption, wherever and in whatever form that may be encountered. This document is intended to clearly state the standards and principles required to ensure conformance to legal requirements within the countries in which we operate.

Bribery and corruption is, unfortunately, a feature of corporate and public life in many countries across the world. Governments, businesses and non-governmental are working together to tackle the issue but despite these collective efforts, eradicating all forms of bribery and corruption will take time. Trakm8 therefore has a clear policy and we support our employees to make decisions in line with our stated position.

Our corporate conduct is based on our commitment to acting professionally, fairly and with integrity. Trakm8 does not tolerate any form of bribery and corruption.

## Purpose

The purpose of this policy is to set out the responsibilities of all Trakm8 Employees and Contractors in observing and upholding our position on bribery and corruption.

## Scope

This policy applies to all Trakm8 commercial activities.

Where we have a minority interest we will encourage the application of this policy amongst our business partners including contractors, suppliers and joint venture partners.

This policy should be implemented in conjunction with the guidance on giving and accepting gifts and hospitality within the Company Expense Policy.

## Policy

Trakm8 sets out our commitment to operate responsibly wherever we work in the world and to engage with our stakeholders to manage the social, environmental and ethical impact of our activities in the different markets in which we operate.

Our first principle, 'integrity in corporate conduct', states that Trakm8 does not engage in bribery or any form of unethical inducement or payment including facilitation payments and 'kickbacks.' All employees are required to avoid any activities that might lead to, or suggest, a conflict of interest with the business of the Company. Employees must declare and keep a record of significant corporate entertainment, hospitality or gifts accepted or offered, which will be subject to managerial review. We do not make direct or indirect contributions to political parties.

We will uphold laws relevant to countering bribery and corruption in all the jurisdictions in which we operate, particularly laws that are directly relevant to specific business practices. The following national and international laws and conventions underpin this policy:

- OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions (1997)
- Foreign Corrupt Practices Act (US)
- OECD Guidelines for Multinational Enterprises – Combating Bribery
- UN Global Compact – Principle 10 (Anti-Corruption)
- Extractive Industry Transparency Initiative

Under UK law, bribery and corruption is punishable for individuals by up to seven years imprisonment, and if the company is found to have taken part in corruption it could face an unlimited fine, be excluded from tendering for Government contracts and face untold damage to its reputation.

### **Responsibilities**

The Group Chief Executive is the main board director with primary responsibility for implementing this policy and for reporting quarterly to the Trakm8 Board of Directors. If any instance of bribery or corruption is identified, we will take remedial steps immediately.

### **Training and communications**

We will communicate this policy and relevant guidance to all employees through our established internal communication channels. We will also communicate this policy via our website to our suppliers, contractors and business partners and wider stakeholders where appropriate. Managers, employees and agents will receive relevant guidance on how to implement this policy in the scope of their employment with the company.

### **Raising concerns and seeking guidance**

Employees are encouraged to raise concerns about any instance of malpractice at the earliest possible stage either through their manager or any Director.

### **Monitoring and review**

The Trakm8 Board will periodically review the implementation of this policy in respect of its suitability, adequacy and effectiveness and make improvements as appropriate.

### **Internal controls and audit**

Trakm8 will establish feedback mechanisms in order to maintain accurate records - available for inspection - which properly and fairly document all financial transactions. Internal control systems will be subject to regular audits to provide assurance that they are effective in countering bribery and corruption.