



FINANCIAL CRIME POLICY

RIGHTMOVE PLC

Policy Owner	Chief Finance Officer
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Version Control

Issue	Status/Reason for amendment	Date	Initials
V2.1	New Policy drafted – Adding Anti Money-Laundering, Sanctions and Terrorist Financing to the Bribery & Corruption Policy	July 2022	IH
V2.2	Policy Approved by RMG Audit Committee	July 2022	IH
V3.1	Policy adjusted to standard template and non-material improvements suggested by ATEB (2 nd line monitoring review)	November 2023	IH

V3.2	Policy amended in section 3.5, Corporate Hospitality and Gifts, to include cumulative gifts and hospitality over a calendar year, for new 'Speak Up'/Whistleblowing Policy and to amend name of CFO	November 2024	CP
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Key Terms in this document

Term / Abbreviation	Description
ABC	Anti-Bribery and Anti-Corruption Bribery can be defined as offering, promising or giving a financial (or other) advantage to another person with the intention of inducing or rewarding that person for acting in a way which a reasonable person would consider improper in the circumstances. Corruption occurs where there is Bribery involved.
AML	Money Laundering is the process by which criminals attempt to conceal the true origin and ownership of the proceeds of criminal activities. If successful, the funds can lose their criminal identity and appear legitimate. Anti-Money Laundering (AML) is the sum of measures to prevent and deter money laundering
BOOM	Beneficial Owners, Officers and Managers – See UBO
PEP	Politically Exposed Person , including: <ul style="list-style-type: none"> ➤ heads of state, heads of government, ministers and deputy or assistant ministers. ➤ members of parliaments or of similar legislative bodies. ➤ members of supreme courts, of constitutional courts or of other high-level judicial bodies the decisions of which are not subject to further appeal, except in exceptional circumstances. ➤ members of courts of auditors or of the boards of central banks. ➤ ambassador and high-ranking officers in the armed forces. ➤ members of the administrative, management or supervisory boards of State-owned enterprises. ➤ and directors, deputy directors and members of the board or equivalent function of an international organisation.
PEP - Close Associate	<ul style="list-style-type: none"> ➤ an individual who is known to have joint beneficial ownership of a legal entity or legal arrangement, or any other close business relations, with a PEP. ➤ and an individual who has sole beneficial ownership of a legal entity or legal arrangement which is known to have been set up for the benefit of a PEP.
PEP - Family Member	<ul style="list-style-type: none"> ➤ a spouse or partner of that PEP. ➤ children of a PEP and their spouses or partners. ➤ and parents of a PEP.
SDNs	Persons, which include but are not limited to individuals, institutions, entities, charities, marine vessels, aircrafts (often called specialty designated nationals or SDNs).
Terrorist Financing	Terrorist Financing is the financial support or sponsoring, in any form, of terrorism or of those who encourage, plan, or engage in terrorism. Counter Terrorist Financing (CTF) is the sum of measures to prevent Terrorist Financing.
Sanctions	Trade & Economic Sanctions (Sanctions) are restrictive measures adopted by specific countries, regional governments and multinational organisations.
UBO	Ultimate Beneficial Owner (UBO) is the natural person(s) who ultimately owns or controls a customer and/or the person on whose behalf a transaction is being conducted. It also incorporates those persons who exercise ultimate effective control over a legal entity or arrangement. This would normally entail 25% ownership or voting rights.

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1. FINANCIAL CRIME OVERVIEW

This policy sets out clear guidelines for behaviour and procedures to prevent Financial Crime. Financial Crime covered by this policy includes impacting regulation in relation to Bribery & Corruption, Money Laundering, Trade and Economic Sanctions and Terrorist Financing.

Our aim is to create and to follow clear and transparent business practices and consistently apply high ethical standards in all our business dealings, and thus not fall foul of impacting regulation. We are committed to acting professionally, fairly and with integrity in all our business dealings and relationships wherever we operate.

This Policy adopts, where possible, a risk-based approach.

2. SCOPE

The Policy applies to all Rightmove directors, employees, contractors and its agents, joint ventures, and contractors, as outlined within contractual obligations.

3. BRIBERY & CORRUPTION

3.1 What is Bribery and Corruption?

Bribery can be defined as offering, promising or giving a financial (or other) advantage to another person with the intention of inducing or rewarding that person for acting in a way which a reasonable person would consider improper in the circumstances (see the Appendix for further information and examples of Bribery). Corruption occurs where there is Bribery involved.

ABC Minimum Requirements	The below noted Anti-Bribery and Anti-Corruption requirements must, unless stated otherwise, be implemented by the first line of defence:
3.2 Rightmove's approach	All Company employees and others acting for or on behalf of the organization are strictly prohibited from offering, soliciting, or receiving any bribes or unauthorized payments. Rightmove Complies with the requirements of the 2010 UK Bribery Act.
3.3 Bribery and Corruption Requirements	<p>Rightmove will not:</p> <ul style="list-style-type: none"> ➤ Promise or offer a bribe; nor request, accept or agree to a bribe. ➤ Tolerate any form of bribery by, or of, its employees, agents, contractors or consultants or any person or organisation acting on its behalf. <p>Rightmove will not conduct business with any service provider, customer or supplier which does not support its anti-bribery objectives.</p>
3.4 Facilitation payments	Facilitation payments are illegal under the Bribery Act. A facilitation payment is a payment made to expedite or secure the performance of a routine non-discretionary action e.g., an official issuing a permit or license for certain trading activity. The use of facilitation payments or actively seeking to bribe a public official are strictly prohibited under this policy (see the Appendix for further information and an example of a facilitation payment).
3.5 Corporate hospitality and gifts	<p>Extending or accepting an invitation to a corporate hospitality event does not normally constitute bribery and the Act does not set out to prohibit such invitations. The same applies to giving or receiving of corporate gifts. However, a gift or hospitality event may constitute bribery where it is extravagant or disproportionate to the business relationship and therefore clearly intended to achieve a competitive advantage or influence a Company employee or third party.</p> <p>Employees should not be concerned about organizing or attending corporate hospitality events, or sending or receiving gifts, which reflect the Company's normal business and marketing practices and comply with Rightmove's expenses policy.</p> <p>All Rightmove Group employees are required to notify the Company Secretary and Human Resources of any corporate gifts or hospitality which they are offered, or plan to offer, which are valued at £100 or more per person. Depending on the value of the corporate gifts or hospitality, prior approval may also be required:</p>

	<ul style="list-style-type: none"> • For corporate gifts or hospitality valued between £100-£150 per person – no approval but notification required for inclusion on the register. • For corporate gifts or hospitality valued at £150, - £200 or more per person – approval is required in advance by Line Manager and notification to the Company Secretary for inclusion on the register. • For corporate gifts or hospitality above £200 per person – approval is required in advance by GLT and notification to the Company Secretary for inclusion on the register. <p>For any relevant corporate gifts or hospitality of values lower than the thresholds set out in this Policy, which arise from the same originating source (e.g. a donating organisation or representative of a donating organisation), and where the cumulative value in any calendar year reaches or exceeds any of those thresholds, the above notification and approval requirements also apply.</p> <p>A schedule of gifts and hospitality (both accepted or declined) will be maintained by the Company Secretary and will be reviewed by the Audit Committee of Rightmove plc annually.</p> <p>Please see the Appendix for further details on the giving and receiving of gifts and hospitality.</p>
3.6 Rightmove promotional materials	Giving promotional materials, such as branded mouse mats, mugs and pens, to existing and potential customers is entirely acceptable and normal business practice and does not constitute bribery. No employee should be concerned about giving third parties promotional items produced in the course of normal marketing activities.
3.7 Charitable donations and corporate sponsorship	Rightmove supports charities through our employees by matching funds raised for registered charities. Matched funding requests must be approved by the Director of People and Development. Any applications for corporate sponsorship require approval from the Chief Marketing Officer. All charitable donations and corporate sponsorship payments are subject to normal budget controls and Ultimate Beneficial Owner checks.

4. TRADE & ECONOMIC SANCTIONS

4.1 What are Trade and Economic Sanctions?

Trade & Economic Sanctions (Sanctions) are restrictive measures adopted by specific countries, regional governments and multinational organisations, legislation, regulation, ministerial orders or similar authority, in pursuit of specific foreign policy and security objectives. Sanctions may be trade, economic or financial in nature and can target:

- Countries.
- Goods and services; or
- Persons, which include but are not limited to individuals, institutions, entities, charities, marine vessels, aircrafts (often called specially designated nationals or SDNs).

Sanctions Minimum Requirements	The below noted Trade and Economic Sanctions requirements must, unless stated otherwise, be implemented by the first line of defence:
4.2 Applicable Sanctions Regimes	<p>Globally there are many sanctions regimes. This Policy expects that the following four main regimes are applied:</p> <ul style="list-style-type: none"> ➤ United Kingdom. ➤ United Nations. ➤ European Union. ➤ United States of America.

	Controls must be established across Rightmove, on a risk-based approach, to ensure that the expectations of the regimes are met.
4.3.1 Sanctions - Third Parties	Rightmove Group and Rightmove Group Landlord & Tennant Services Limited (RLTS) - Ultimate Beneficial Owner (UBO) checks, sometimes also called Beneficial Owners, Officers and Managers (BOOM), must be completed on all third parties. These checks against the SDN lists must also be completed on any individual UBO's with a 25% or above share ownership or voting right. On a risk-based approach the third parties UBO's must be checked periodically, as the lists are updated on an ongoing and frequent bases. Rightmove Financial Services Limited (RMFS) - Third party UBO checks are completed by Rightmove Group for RMFS.
4.3.2 Sanctions - Consumers of Rightmove Group and individual customers of RMFS and RLTS	Rightmove Group and RMFS – There are no required SDN checks for Consumers of Rightmove Group or Mortgage Customers of RMFS. RLTS – All consumers and Insurance Customers for RLTS are required to have SDN checks completed on the individuals. These checks against the sanction's lists must be completed periodically on an ongoing basis.
4.3.3 Sanctions - Employees	Rightmove Group, RLTS and RMFS - Employees must have sanctions checks completed prior to employment periodically on an ongoing basis.
4.4 Sanctions True matches and near misses.	Any SDN checks that return a true match against one or more of the sanctions lists must be reported to the Legal and Compliance Team as soon as possible. Any close matches must be investigated by the business to confirm if they are true matches or misses. The Legal and Compliance Team, with the business, will investigate the true match and the Legal and Compliance Team will deal with the appropriate authorities as required.

5. ANTI-MONEY LAUNDERING

5.1 What is Money Laundering?

Money Laundering is the process by which criminals attempt to conceal the true origin and ownership of the proceeds of criminal activities. If successful, the funds can lose their criminal identity and appear legitimate. Anti-Money Laundering (AML) is the sum of measures to prevent and deter Money Laundering.

Money Laundering usually involves a complex series of transactions that are difficult to separate, although three stages can be identified:

- Placement: The introduction of illegally obtained funds or other valuables into financial or non-financial institutions.
- Layering: Separating the proceeds of criminal activity from their source using layers of complex financial transactions. These layers are designed to hamper the audit trail, disguise the origin of funds and provide anonymity.
- Integration: Placing the laundered proceeds back into the economy in such a way that they re-enter the financial system as apparently legitimate funds.

Rightmove Group through the nature of their housing market activities may facilitate Money Laundering and Financial Crime by allowing estate agents, letting agents and / or new build access to the financial systems and platforms where financial crime may take place or be made possible.

5.2 What is Terrorist Financing?

Terrorist Financing is the financial support or sponsoring, in any form, of terrorism or of those who encourage, plan, or engage in terrorism.

Whereas funds destined for money laundering are derived from criminal activities, the funds used for terrorist financing can originate from both legitimate and illegitimate sources. However, the funds will be used for illegal purposes.

Where Money Laundering in this policy is mentioned, this should be read to include Terrorist Financing.

AML Minimum Requirements	The below noted AML requirements must, unless stated otherwise, be implemented by the first line of defence:
5.3 Politically Exposed Persons	Some individuals, through the nature of their roles or interactions, may be Politically Exposed Persons (PEPs). These individuals should be identified, and a note of their PEP status made. Being a PEP does not indicate that Financial Crime has or will take place, it is just a flag that the individual may be exposed to a bribe or other Financial Crime activity. It is important that PEPs are dealt with in the normal way until the time that more flags are raised. At this stage the case should be raised with the Legal and Compliance Team.
5.4.1 Third Parties	Rightmove Group, RMFS & RLTS - UBO must be completed on all third parties to identify PEPs. On a risk-based approach the third parties UBOs must be checked periodically against PEP lists, as the lists are updated on an ongoing and frequent bases. These checks can be carried out when Sanctions checks are completed.
5.4.2 Consumers of Rightmove Group and individual customers of RMFS and RLTS	Rightmove Group and RMFS – There are no requirement to complete PEP checks for Consumers of Rightmove Group or Mortgage Customers of RMFS. RLTS – All consumers and Insurance Customers for RLTS are required to have PEP checks completed on the individuals. These checks against the sanction’s lists must be completed periodically on an ongoing basis. These checks can be carried out when Sanctions checks are completed.
5.4.3 Employees	Rightmove Group, RLTS and RMFS - Employees must have PEP checks completed prior to employment periodically on an ongoing basis. These checks can be carried out when Sanctions checks are completed.
5.5 PEP True Matches and Near Misses.	Any PEP matches must have their exposure to financial crime considered. Any close matches must be investigated by the business to confirm if they are true matches or misses. The Legal and Compliance Team should be consulted to determine the level of Financial Crime risk for any identified PEPs and any required mitigating activities.
5.6 Money Laundering Reporting Officer	The financial Conduct Authority (FCA) requires some regulated Firms to appoint a senior manager as the Money Laundering Reporting Officer, this individual is “...the person who has responsibility for overseeing the firm’s compliance with the FCA’s rules on systems and controls against money laundering”. Due to the nature of RLTS and RMFS regulated activities, no such person is required. However, as regulated activates can change over time, this stance must be assessed annually within the Financial Crime Risk Assessment.
5.7 Suspected Money Laundering and Tipping off	Under Money Laundering legislation it is an offence to tip off any individual or organisation suspected of money laundering as this may interrupt an ongoing investigation. Any suspicions of money laundering must be reported to the Legal and Compliance Team as soon as possible who will in turn deal with the appropriate authorities.

<p>6. PREVENTION CHECKS</p>	<p>The below noted prevention checks relate to all areas of financial crime within scope of this policy and must, unless stated otherwise, be implemented by the first line of defence:</p>
<p>6.1 Due Diligence</p>	<p>Knowing the identity of the individuals and entities we are dealing with constitutes a good control in combatting financial crime. It is important to remember that the actual identity of individuals will be purposely hidden. If it feels wrong or flags are being raised, investigate it and report to the Legal and Compliance Team, but don't tip them off.</p> <p>All parties providing services to the company must undergo appropriate and proportionate risk-based initial and ongoing due diligence. On a risk-based approach, the Due Diligence must include indicators of financial crime. Full records of the Due Diligence must be kept in line with internal record keeping requirements, and due diligence failures must be reported to senior management for review and action. Where Due Diligence is not passed for Financial Crime, the engagement must be stopped, or the risk must be accepted by the responsible senior manager. The Legal and Compliance Team can assist with this assessment.</p> <p>Rightmove's zero tolerance approach to Financial Crime must also be communicated to all business partners at the outset of the business relationship with them and as appropriate thereafter.</p>
<p>6.2 Payment Controls – Red Flags</p>	<p>All payments received or made by Rightmove must undergo appropriate and proportionate payment controls. Some of these controls, on a risk-based approach, must be tailored to identify indicators of financial crime. Where these indicators raise concerns, the transaction must be further investigated. If the investigation raises further concerns the transaction must be escalated to senior management and the Legal and Compliance Team for review and assessment. This review and assessment may require escalation to the appropriate authorities; see the Suspicious Activity Reporting and investigations section below.</p>
<p>6.3 Risk Based Approach</p>	<p>An annual risk assessment should be completed, considering impacting legislation and regulation, to focus mitigating activities towards areas of higher Financial Crime Risk. Results of the Financial Crime Risk Assessment must be reported to senior management and appropriate mitigating activities should be designed and operated.</p> <p>The Risk Assessment must complete a review of the design and operation of mitigating controls.</p>
<p>6.4 Suspicious Activity Reporting and investigations</p>	<p>There may be instances where Rightmove reports suspicious activities to the National Crime Agency (NCA). These reports to the NCA are known as Suspicious Activity Reports or SARs. The Legal and Compliance Team will make the SARs to the NCA on behalf of Rightmove Group. If any suspicious activities are identified by the business, then the Legal and Compliance Team should be contacted for advice and guidance.</p>
<p>6.5 Penalties and Disciplinary</p>	<p>Penalties against companies breaching Financial Crime legislation can be high, potential fines of millions of pounds, reputation damage and an impact on strategic objectives.</p> <p>An individual committing an offence could face imprisonment for up to 10 years or a fine or both. In addition, senior officers of the company may be personally liable for 'consenting or conspiring' in an offence.</p> <p>Therefore, any breach of this policy by an employee, including the failure to follow proper reporting procedures, will be treated as grounds for disciplinary action, and may amount to gross misconduct and warrant summary dismissal.</p>

6.6 Policy compliance and record keeping	This policy will be reviewed at least annually, and any changes approved by the Board. Records relating to this policy must be kept in line with Rightmove Groups Data Protection, Categorisation and Retention Policy.
6.7 Training Delivery and Completion	<p>The Company will provide annual training to all employees to help them understand their duties and responsibilities under this Policy.</p> <p>The Financial Crime Training will include a test that all must pass. Failure to pass the test may result in disciplinary actions.</p>

7. ROLES AND RESPONSIBILITIES

7.1 The Audit Committee

- Review and Approve this Policy on behalf of the Board.
- Support the spirit and requirements of this Policy.

7.2 Business Management

- Make available resources appropriate to ensure compliance with this Policy.
- Ensure that this Policy is communicated to staff.
- Ensure employees know, understand, and comply with the responsibilities and spirit of this Policy.
- Ensure employees understand the importance and expectation of participation in appropriate training.
- Deliver first line of defense responsibilities as expected by this Policy.
- Develop, operate and act on appropriate and proportionate Management Information and Key Performance Indicators.
- Ensure that the Legal and Compliance Team are consulted as and when required.
- Identify and Escalate Suspicious activity to the Legal and Compliance Team.

7.3 Employees

- Know, understand and comply with the requirements and spirit of this Policy.
- Participate in, and successfully complete, training where required.
- Understand the consequences of not complying with the requirements of this Policy.
- Raise issues and concerns when they arise.

7.4 Legal and Compliance Team

- Develop, review and maintain this Policy and facilitate the annual risk assessment.
- Provide guidance, training materials and advice with respect to the implementation and operation of this Policy.
- Advise and assist in complex situations.
- On a risk-based approach monitor compliance with this Policy and oversee remediation of non-compliant issues.
- Maintain an appropriate and proportionate issue escalation and management process.
- Liaise with external agencies and regulators.

8. BREACHES / CONCERNS / POLICY CONTACTS

8.1 How to seek advice or raise a concern

If, for whatever reason, you are unsure whether you or the company may be at risk of breaching the Financial Crime requirements, you can seek advice from the Legal and Compliance Team. Similarly, and in line with our 'Speak up'/Whistleblowing Policy (which can be found on our HR system, Bamboo), Rightmove will support any employee who reports suspected Financial Crime activity by anyone acting for the Company. In the first instance, we recommend that you speak to your manager if you have any concerns and also contact one of the contacts listed below.

8.2 Contacts

Name	Title	Department	Email
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Carolyn Pollard	Company Secretary	Co Sec	CompanySecretary@rightmove.co.uk
Jennie Barker	Chief People Officer	Human Resources	Jennie.Barker@rightmove.co.uk

8.3 Policy Owner

Ruaridh Hook	Chief Finance Officer	Finance	ruaridh.hook@rightmove.co.uk
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9. ‘SPEAK UP’ /WHISTLE-BLOWING

Breaches of this policy or concerns can be escalated in line with the Rightmove ‘Speak up’/Whistleblowing Policy.

10. APPROVALS

Date Approved - Confirmed by the Audit Committee on 5 November 2024

Last Approved - November 2023

Next Review - November 2025

11. Relationship to other documents

Further guidance and related RMG policies	Description
Conduct Risk Policy	Rightmove’s policy for how we conduct ourselves individually and as a Business
Conflicts of Interest Policy	The Conflicts of Interest Policy sets out methods for identifying, managing and monitoring conflicts of interest.
Data Categorisation and Retention Policy.	The Record Retention Schedule determines how long records should be kept.
‘Speak up’/Whistleblowing Policy	The ‘Speak up’/Whistleblowing Policy enables members of staff to raise genuine concerns of malpractice at an early stage and in the right way. The Policy and supporting legislation enable members of staff to make disclosures, which are in the public interest, by giving them protection from detrimental treatment, such as denial of promotion, training opportunities or facilities that would otherwise have been available and victimisation.

APPENDIX

BRIBERY

Example of offering a Bribe:

You offer a potential client or customer tickets to a major sporting event, but only if they agree to do business with us.

This would be an offence as you are making the offer to gain a commercial and/or contractual advantage. We may also be found to have committed an offence because the offer has been made to obtain business for us. It may also be an offence for the potential client to accept your offer.

Example of receiving a bribe:

A supplier gives your nephew a job but makes it clear that in return they expect you to use your influence in our organisation to ensure we continue to do business with them.

It is an offence for a supplier to make such an offer. It would be an offence for you to accept the offer as you would be doing so to gain a personal advantage.

Example of bribing a foreign official:

You arrange for the business to pay an additional payment to a foreign official to speed up an administrative process, such as clearing our goods through customs.

The offence of bribing a foreign public official through Facilitation Payments has been committed as soon as the offer is made. This is because it is made to gain a business advantage for us. We may also be found to have committed an offence.

POTENTIAL RISK SCENARIOS: "RED FLAGS"

The following is a list of possible red flags that may arise while you work for Rightmove and which may raise concerns under various anti-bribery and anti-corruption laws. The list is not intended to be exhaustive and is for illustrative purposes only.

If you encounter any of these red flags while working for Rightmove, you must report them promptly to the Company Secretary or using the procedure set out in the Whistleblowing policy:

- you become aware that a third party engages in, or has been accused of engaging in, improper business practices.
- you learn that a third party has a reputation for paying bribes, or requiring that bribes are paid to them, or has a reputation for having a "special relationship" with foreign government officials.
- a third party insists on receiving a commission or fee payment before committing to sign up to a contract with us or carrying out a government function or process for us.
- a third-party requests payment in cash and/or refuses to sign a formal commission or fee agreement, or to provide an invoice or receipt for a payment made.
- a third-party request that payment is made to a country or geographic location different from where the third party resides or conducts business.
- a third party requests an unexpected additional fee or commission to "facilitate" a service.
- a third party demands lavish entertainment or gifts before commencing or continuing contractual negotiations or provision of services.

- a third-party request that a payment is made to "overlook" potential legal violations.
- a third-party request that you provide employment or some other advantage to a friend or relative.
- you receive an invoice from a third party that appears to be non-standard or customised.
- a third party insists on the use of side letters or refuses to put terms agreed in writing.
- you notice that we have been invoiced for a commission or fee payment that appears large given the service stated to have been provided.
- a third party requests or requires the use of an agent, intermediary, consultant, distributor or supplier that is not typically used by or known to us.

GIFTS AND HOSPITALITY

The giving or receipt of gifts is not prohibited, if the following requirements are met:

- it is not made with the intention of influencing a third party to obtain or retain business or a business advantage, or to reward the provision or retention of business or a business advantage, or in explicit or implicit exchange for favours or benefits.
- it complies with local law.
- it is given in our name, not in your name.
- it does not include cash or a cash equivalent (such as gift certificates or vouchers);
- it is appropriate in the circumstances. For example, in the UK it is customary for small gifts to be given at Christmas time.
- considering the reason for the gift, it is of an appropriate type and value and given at an appropriate time; and
- it is given openly, not secretly.

Gifts should not be offered to, or accepted from, government officials including foreign government officials or representatives, or politicians or political parties, without the prior approval of the Company Secretary.

We appreciate that the market practice of giving business gifts varies between countries and regions and what may be normal and acceptable in one region may not be in another. The test to be applied is whether in all the circumstances the gift or hospitality is reasonable and justifiable. The intention behind the gift should always be considered.