

Anti-Bribery & Corruption Policy

Introduction

LuxRelo values its reputation and is committed to maintaining the highest level of ethical standards in the conduct of its business affairs. The actions and conduct of the organization's staff as well as others acting on the organization's behalf are key to maintaining these standards.

The purpose of this document is to set out the organization's policy in relation to bribery and corruption. The policy applies strictly to all employees, partners, agents, consultants, contractors and to any other people or bodies associated with LuxRelo within all offices, areas and functions.

Understanding and recognizing bribery and corruption

Acts of bribery or corruption are designed to influence an individual in the performance of their duty and incline them to act in a way that a reasonable person would consider to be dishonest under the circumstances.

Bribery can be defined as offering, promising or giving a financial (or other) advantage to another person with the intention of inducing that person to act or to reward them for having acted in a way which a reasonable person would consider improper under the circumstances. Corruption is any form of abuse of entrusted power for private gain and may include, but is not limited to, bribery.

Bribes are not always a matter of handing over cash. Gifts, hospitality and entertainment can be bribes if they are intended to influence a decision. **For high risk areas, consider some of the following points:**

- How do other international companies in the same area operate? Can they recommend particular individuals or groups to work with?
- The relationship with the local or national government. Do you have direct lines of communication with trustworthy officials, and do your operations comply with your company's anti-money laundering and anti-bribery policies?
- Engage with local labour groups and NGOs. Establish relationships with groups on the ground who can advise on good practices and provide local knowledge.

Penalties

Under Luxembourg Penal Law, bribery by individuals is punishable by up to 10 years imprisonment and a fine of €500 to €187,500.

If the organization is found to have taken part in bribery or is found to lack adequate procedures to prevent bribery, it too could face a fine.

A conviction for a bribery or corruption related offence would have severe reputational and/or financial consequences for the organization.

Policy

LuxRelo will not tolerate bribery or corruption in any form.

The organization prohibits the offering, giving, solicitation or acceptance of any bribe or corrupt inducement, whether in cash or in any other form:

- To or from any person or company wherever located, whether a public official or public body, or a private person or company
- By any individual employee, partner, agent, consultant, contractor or other person or body acting on the organization's behalf
- In order to gain any commercial, contractual or regulatory advantage for the practice in any way which is unethical or to gain any personal advantage, pecuniary or otherwise, for the individual or anyone connected with the individual

This policy is not intended to prohibit the following practices provided they are appropriate, proportionate and are properly recorded:

- Normal hospitality
- Fast tracking a process which is available to all on the payment of a fee; and/or

- Providing resources to assist a person or body to make a decision more efficiently, provided that it is for this purpose only

It may not always be a simple matter to determine whether a possible course of action is appropriate. If you are in any doubt as to whether a possible act might be in breach of this policy or the law, the matter should be referred to Stéphane Compain who is the organization's Compliance Officer.

The organization will investigate thoroughly any actual or suspected breach of this policy, or the spirit of this policy. Employees found to be in breach of this policy may be subject to disciplinary action which may ultimately result in their dismissal.

Key risk areas

Bribery can be a risk in many areas of the organization. Below are the key areas you should be aware of in particular:

- Excessive gifts, entertainment and hospitality can be used to exert improper influence on decision makers. Gifts, entertainment and hospitality are acceptable provided they are within reasonable limits and are authorized by a partner. Any gift or hospitality, either given or received, over the value of 100 € per person should be reported to the Compliance Officer.
- Facilitation payments are used by businesses or individuals to secure or expedite the performance of a routine or necessary action to which the payer has an entitlement as of right. The practice will not tolerate or excuse such payments being made.
- Reciprocal agreements or any other form of 'quid pro quo' are never acceptable unless they are legitimate business arrangements which are properly documented and approved by a partner. Improper payments to obtain new business, retain existing business or secure any improper advantage should never be accepted or made.
- Actions by third parties for which the practice may be held responsible can include actions by a range of people, e.g. agents, contractors and consultants, acting on the practice's behalf. Appropriate due diligence should be undertaken before a third party is engaged. Third parties should only be engaged where there is a clear business rationale for doing so, with an appropriate contract. Any payments to third parties should be properly authorized and recorded.

- Record keeping can be exploited to conceal bribes or corrupt practices. We must ensure that we have robust controls in place so that our records are accurate and transparent. The Compliance Officer is responsible for all record keeping.

Employee responsibility and how to raise a concern

The prevention, detection and reporting of bribery or corruption are the responsibility of all partners and employees of the practice. If you become aware or suspect that an activity or conduct which is proposed or has taken place is a bribe or corrupt, then you have a duty to report this to the Compliance Officer without delay.