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## C. Anti-Corruption and Anti-Money Laundering Policy

### 1. Introduction

ProPartners is committed to conducting its business affairs with the highest level of integrity and in compliance with all applicable laws and regulations regarding anti-corruption and anti-money laundering. This policy outlines our commitment to preventing corruption and money laundering, as well as the procedures by which we strive to ensure a transparent, ethical business environment.

### 2. Objectives

The objectives of this policy are to:

- Promote ethical behavior and integrity in all business dealings
- Prevent corruption and money laundering activities within our operations
- Protect ProPartners, its employees, clients, and partners from the risks associated with corruption and money laundering
- Comply with all applicable national and international laws regarding anti-corruption and anti-money laundering.

### 3. Scope

This policy applies to:

- All employees of ProPartners
- Managers, officers, and agents of ProPartners
- Third parties engaged by ProPartners, including contractors, consultants, and any entity providing services to the company.

### 4. Definitions

- **Corruption:** The abuse of entrusted power for private gain, including bribery, nepotism, and unfair favoritism

- **Bribery:** Offering, giving, receiving, or soliciting anything of value to influence the actions of a public official or other individuals in position of authority
- **Money Laundering:** The process of concealing the origins of illegally obtained money, typically through a series of transactions to make it appear legitimate.

## **5. Compliance with Laws and Regulations**

ProPartners will adhere to the laws and regulations governing anti-corruption and anti-money laundering in all jurisdictions where it operates, including but not limited to:

- The Foreign Corrupt Practices Act (FCPA) (U.S.)
- The Bribery Act (UK)
- Local laws concerning corruption and money laundering in each operating jurisdiction.

## **6. Prohibition of Bribery and Corruption**

ProPartners strictly prohibits:

- The offering, promising, giving, or accepting of bribes or other improper benefits, directly or indirectly, in connection with any business transaction
- Engaging in any activities that may create a conflict of interest
- Making political contributions or charitable donations with the intention of influencing business decisions

## **7. Risk Assessment**

ProPartners will regularly conduct a risk assessment to identify potential vulnerability areas related to corruption and money laundering. This assessment will inform our training, procedures, and monitoring practices.

## **8. Due Diligence**

Prior to engaging with third parties, ProPartners will perform due diligence that may include:

- Background checks
- Financial history reviews
- Assessing the corruption and money laundering risk associated with the third party

## **9. Employee Guidelines and Training**

All employees must:

- Complete training programs on anti-corruption and anti-money laundering policies annually
- Report any suspicious activities or potential violations of this policy to their supervisor or report directly via the designated reporting mechanism

## **10. Reporting and Whistleblower Protection**

ProPartners encourages an environment where employees can report concerns without fear of retaliation. Reports can be made anonymously and will be treated confidentially. ProPartners will not tolerate retaliation against anyone who reports in good faith.

## **11. Monitoring and Auditing**

ProPartners will conduct periodic reviews and audits of its operations to ensure compliance with this policy. These audits will assess the effectiveness of anti-corruption and anti-money laundering measures in place.

## **12. Enforcement and Disciplinary Action**

Violations of this policy may result in disciplinary actions, up to and including termination of employment or contracts. ProPartners reserves the right to take legal action against individuals or entities that violate this policy.

## **13. Conclusion**

ProPartners is committed to the highest standards of ethical behavior. This Anti-Corruption and Anti-Money Laundering Policy reflects our dedication to transparency and integrity in all business dealings. All employees and partners are expected to comply with this policy and uphold the company's values.

## **14. Review and Modifications**

This policy will be reviewed annually and modified as necessary to reflect changes in laws, regulations, and organizational practices.

## **15. Contact Information**

For questions regarding this policy, please contact the Compliance Officer at [legal.contracts@propartnerssa.com](mailto:legal.contracts@propartnerssa.com)

This Anti-Corruption and Anti-Money Laundering Policy serves as a foundational document for ethical operations within ProPartners and should be disseminated to all stakeholders as part of the contracting process.