



Anti-Corruption Policy

Introduction

The Company of Animals is committed to conducting our business with the highest level of integrity and ethical standards. Our Global Anti-Corruption Policy reflects this commitment by strictly prohibiting all forms of corruption, including bribery, kickbacks, and unethical business practices, across our operations worldwide.

We hold ourselves accountable to the laws and regulations of every country in which we operate and expect the same from all employees, partners, and third parties acting on our behalf. The Company of Animals has a zero-tolerance approach to corruption, and we pledge to maintain transparency, foster a culture of honesty, and uphold our responsibility to act in the best interests of our customers, stakeholders, and communities.

Purpose and Scope

Purpose:

The purpose of this policy is to set forth the organization's commitment to preventing and detecting corruption, bribery, and other forms of unethical conduct. This policy provides guidelines for maintaining the highest standards of integrity and compliance with applicable laws and regulations.

Scope:

This policy applies to all employees, officers, directors, agents, consultants, contractors, and any third parties acting on behalf of the organization, regardless of location. It covers all business activities conducted by the organization globally.

Policy Statement

The organization has a zero-tolerance approach to corruption and bribery. We are committed to conducting all business activities with honesty, integrity, and transparency. Any form of corruption, including bribery, kickbacks, fraud, or any unethical practices, is strictly prohibited.

Definitions

Corruption: The abuse of entrusted power for private gain.

Bribery: Offering, giving, receiving, or soliciting something of value to influence the actions of an official or other person in a position of authority.

Facilitation Payments: Small payments made to expedite routine government actions, which are also prohibited under this policy.

Kickbacks: Payments made in return for a business favor or advantage.



Compliance with Laws and Regulations

All employees and associated parties must comply with the anti-corruption laws and regulations of every country in which the organization operates, including but not limited to:

- The U.S. Foreign Corrupt Practices Act (FCPA)
- The UK Bribery Act
- The OECD Anti-Bribery Convention
- Local anti-corruption laws

Prohibited Conduct

The following activities are strictly prohibited:

Bribery and Corruption: No employee or associated party shall offer, give, solicit, or receive bribes or engage in any form of corruption.

Facilitation Payments: Even small payments to expedite routine procedures are not allowed.

Gifts and Hospitality: Gifts or hospitality that could influence or appear to influence a business decision are prohibited. Any gifts or hospitality given or received must be of nominal value and fully compliant with the organization's gift policy.

Political Contributions: No political contributions shall be made by or on behalf of the organization without prior approval from the Board of Directors.

Charitable Donations: Charitable donations must not be used as a means to conceal bribery or other corrupt practices. All donations must be transparent and approved in accordance with the organization's charitable giving policy.

Responsibilities

Employees: Every employee is responsible for understanding and complying with this policy. Employees must report any concerns or suspected violations to their Line Manager or HR department.

Managers: Managers must ensure that their teams understand and adhere to this policy. They are also responsible for fostering a culture of integrity and compliance within their areas of responsibility.

Compliance: The HR department is responsible for overseeing the implementation of this policy, conducting regular risk assessments, providing training, and investigating any reports of suspected violations.

Due Diligence

Third-Party Due Diligence: The organization must conduct thorough due diligence on all third parties, including agents, consultants, contractors, and suppliers, to ensure they share our commitment to anti-corruption.



Mergers and Acquisitions: Due diligence must also be conducted during mergers, acquisitions, and joint ventures to assess the risk of corruption and ensure compliance with this policy.

Training and Communication

Training Programs: Regular anti-corruption/conflict of interest training will be provided to all employees, particularly those in high-risk roles or regions. Training will cover relevant laws, this policy, and how to recognize and report corrupt activities.

Communication: The organization will regularly communicate the importance of anti-corruption measures and updates to this policy through internal channels, ensuring that all employees are aware of their responsibilities.

Reporting and Whistleblower Protection

Reporting Mechanisms: Employees and third parties are encouraged to report any suspected violations of this policy through designated reporting channels, such as a secure email.

Whistleblower Protection: The organization is committed to protecting whistleblowers from retaliation. Any form of retaliation against an employee or third party who reports a concern in good faith is strictly prohibited.

Monitoring

Monitoring: The organization will monitor its business activities, including financial transactions and third-party relationships, to detect and prevent corruption.

Disciplinary Actions

Any employee or associated party found to be in violation of this policy will be subject to disciplinary action, up to and including termination of employment or contract, and may also face legal action.

Review and Updates

This policy will be reviewed as required to reflect changes in laws, regulations, or business practices. Any updates will be communicated to all employees and relevant third parties.

Approval and Acknowledgment

All employees, officers, directors, and associated parties must acknowledge their understanding and acceptance of this policy. The policy must be formally approved by the Board of Directors.

Global Considerations

Local Adaptation: While this policy sets global standards, it must be adapted as necessary to comply with local laws and cultural practices. However, the core principles of this policy shall not be compromised.



Cultural Sensitivity: Training and communication about this policy will take into account cultural differences and legal variations across different regions.

Documentation and Record-Keeping

Record Keeping: All financial records, contracts, and related documentation must be maintained accurately and in compliance with applicable laws and this policy.

Documentation of Compliance: The organization must document its compliance efforts, including due diligence processes, training records, and audit results, to demonstrate adherence to this policy.

This comprehensive Global Anti-Corruption Policy is designed to protect the organisation from the risks associated with corruption and bribery, ensure compliance with relevant laws, and maintain the highest standards of ethical conduct in all business dealings.