



ANTI BRIBERY & CORRUPTION POLICY

This Anti Corruption & Bribery Policy & Procedure is designed to help and to assist UNITED GLOBAL ONE Pty Ltd t/as UNITED GLOBAL PAY in preventing bribes and corruptions to occur inside the organisation. UNITED GLOBAL ONE Pty Ltd t/as UNITED GLOBAL PAY is referred to as “UGP” “we” “our” or “us”.

In compliance with AML/CTF Acts and Rules, UGP is extremely committed to implement ethical business practices within its organisation. This policy and procedure will describe United Global Pay’s policy and procedure in prohibiting corruption, bribery, excessive gifts, improper and excessive payments in relation to its business operations and employee responsibilities. All relevant questions about our policy and procedure should be directed to our Compliance Officer.

United Global Pay strictly prohibits corruption, bribery and other improper payments in any of its business operations. This policy applies to all of its business activities worldwide, regardless whether it is involving other commercial entities, public figures, or government officials. Improper payment or excessive payment and gift to secure advantages or benefits in businesses is intolerable and never be accepted in our organisation.

Following are types of payments which are prohibited at UGP:

- Political Donations and Charities;
- Investment Opportunities;
- Cash Payments;
- Gifts, including unreasonable expenses;
- Unreasonable promotional activities and entertainment;
- Offers of Employment/Benefits/Advantages to a family member/a friend/a government official/a foreign official; and
- Charitable Sponsorships.