

# **Anti-Corruption Policy**

# 1. Purpose and Scope

This Anti-Corruption Policy outlines The Marketing Society's commitment to conducting business ethically and in compliance with all applicable anti-corruption laws and regulations. This policy applies to all employees, officers and directors.

#### 2. Policy Statement

The Marketing Society's has a zero-tolerance approach to bribery and corruption. We are committed to acting professionally, fairly, and with integrity in all our business dealings and relationships, wherever we operate.

#### 3. Definitions

- Bribery: Offering, promising, giving, accepting, or soliciting of an advantage as an inducement for action which is illegal, unethical, or a breach of trust.
- Corruption: The abuse of entrusted power for private gain.
- Facilitation Payments: Small payments made to secure or expedite the performance of a routine or necessary action to which the payer has legal or other entitlement.

# 4. Prohibited Conduct

The following activities are strictly prohibited:

- Offering, giving, or receiving bribes in any form
- Making facilitation payments
- Offering or accepting gifts, hospitality, or expenses that could influence business decisions
- Using third parties to circumvent this policy
- Making political contributions on behalf of the company
- Engaging in any form of money laundering

# 5. Gifts and Hospitality



Employees may offer or accept reasonable and appropriate gifts and hospitality for legitimate purposes such as building relationships, maintaining our image or reputation, or marketing our products and services. However, all gifts and hospitality must be:

- Given in good faith without expectation of reciprocity
- Compliant with local law
- Reasonable in value and infrequent
- Transparently recorded in the company's books

# 6. Record Keeping

The Marketing Society will keep detailed and accurate financial records and have appropriate internal controls in place to evidence the business reason for making payments to third parties.

# 7. Training and Communication

All employees will receive relevant training on how to implement and adhere to this policy.

# 8. Monitoring and Review

The effectiveness of this policy will be regularly reviewed by the Board of Directors. Internal control systems and procedures will be subject to regular audits to provide assurance that they are effective in countering bribery and corruption.

# 9. Reporting Violations

Employees are encouraged to raise concerns about any issue or suspicion of malpractice at the earliest possible stage. Any employee who breaches this policy will face disciplinary action, which could result in dismissal for gross misconduct.

# 10. Protection

Employees who refuse to accept or offer a bribe, or those who raise concerns or report another's wrongdoing, are sometimes worried about possible repercussions. The Marketing Society aims to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken.