



## **Anti-Corruption and Anti-Bribery Policy**

### ***Putters International Will Not Tolerate Bribery or any form of Corruption***

Bribery is the offering, promising, giving, accepting or soliciting of an advantage as an inducement for action. It is illegal, and it is a breach of trust.

A bribe is an inducement or reward offered, promised or provided in order to gain a commercial, contractual, regulatory or personal advantage.

Corruption, bribery or attempted bribery is unacceptable. This applies whether offering a bribe, or accepting a bribe. It is against Putters International's core values of conducting business to the highest legal, moral and ethical standards. Bribery and corruption are covered by various international laws and statutes. These laws often require companies to have rigorous, pro-active measures in place to detect and prevent corrupt practices.

We insist that our service providers commit to legal and ethical behaviour, and to refrain from doing anything that will harm the interests of our customers or the industry. We also ask our service providers to take steps to ensure they are fully informed of applicable regulations and will monitor their employees and business partners to ensure full and continual compliance.

### **Legal compliance**

Our service providers will ensure that they are aware of all applicable laws countering bribery and corruption in all the jurisdictions in which they operate, and that they will obey and uphold those laws.

### **Ethical Behaviour**

As a demonstration of its commitment, we ask our service providers to pledge to take a zero-tolerance approach to bribery and corruption. Our service providers will act professionally, fairly and with the utmost integrity in all business dealings and relationships. This will apply wherever they operate.





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### **Service Provider Code of Conduct**

By agreeing and committing to ethical behaviour as a service provider for Putters International, undertakes to:

1. Never engage in any form of bribery, either directly or through any third party.
2. Never offer or make an improper payment, or authorize an improper payment (cash or otherwise) to any individual, including any local or foreign official anywhere in the world.
3. Never attempt to induce an individual, or a local or foreign official to act illegally or improperly.
4. Never offer, or accept, money or anything of value, such as gifts, kickbacks or commissions, in connection with the procurement of business or the award of a contract.
5. Never offer or give any gift or token of hospitality to any public employee or government official or representative if there is any expectation or implication for a return favour.
6. Never accept any gift from any business partner if there is any suggestion that a return favour will be expected or implied.
7. Never facilitate payments to obtain a level of service which one would not normally be entitled to.
8. Never disregard or fail to report any indication of improper payments to the appropriate authorities.
9. Never induce or assist another individual to break any applicable law or regulation.

