



**STONEWEG**  
EUROPEAN REIT

# **Anti-bribery and Anti-Corruption Policy**

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**STONEWEG EUROPEAN REIT**

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**Version Control**

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<b>Effective Date</b>	23 February 2023
<b>Version No.</b>	2
<b>Process Owner</b>	Head of Risk, Compliance and Company Secretarial
<b>Approved by</b>	Board of Directors

**Amendment History**

<b>Version No.</b>	<b>Effective Date</b>	<b>Description of Change</b>	<b>Author</b>
1.0	15 March 2021	Version 1	Kathleen Tan
2.0	23 February 2023	Training Schedule Included	Kathleen Tan

- A. Stoneweg European REIT ("SERT") is listed and traded on the Singapore Exchange. Stoneweg EREIT Management Pte. Ltd. acts as the REIT Manager of SERT. Stoneweg EREIT Management Pte. Ltd. and its subsidiaries shall be referred to as the "Manager" and SERT and its subsidiaries together with the Manager shall be referred to as the "SERT Group".
- B. SERT Group is committed to the prevention of bribery and corruption and has taken a risk based and proportionate approach which is reflective of the nature and scale of our business activities. To assist it in upholding its commitment in the context of bribery-related issues, it has designed and implemented the following Anti-bribery and Anti-corruption Policy (this "Policy").
- C. This Policy applies to all SERT Group entities and to individuals working at all levels and grades, including senior managers, officers, directors, employees (whether permanent, fixed-term or temporary), consultants, contractors, trainees, seconded staff, homeworkers, casual workers and agency staff, volunteers, interns, agents, sponsors, and other associated persons<sup>1</sup>, working in respect thereof wherever located (collectively referred to as "**SERT Personnel**" in this Policy).
- D. SERT Group's zero-tolerance approach to bribery and corruption should be communicated to all business partners at the outset of a business relationship with them and as appropriate thereafter.
- E. SERT Group will uphold all laws relevant to countering bribery and corruption in all the jurisdictions in which it operates; including but not limited to the principles under the U.K Bribery Act 2010 (the "U.K. Bribery Act") to conduct SERT Group entities across the EU and the Prevention of Corruption Act, Chapter 241 of Singapore the ("PCA").
- F. There are four distinct bribery offences under the U.K. Bribery Act and the PCA:
- offering or giving a bribe;
  - receiving or agreeing to receive a bribe;
  - bribery of a foreign public official; and
  - failure on the part of a commercial organisation to prevent bribery from being committed by someone providing services on its behalf.
- G. Additionally, if SERT Group is found to have taken part in corruption it could be excluded from tendering for public contracts and face damage to our reputation. SERT Group therefore takes its legal responsibilities very seriously.
- H. The Policy requires that all SERT Group Personnel must conduct their activities in full compliance with all applicable anti-corruption laws, including without limitation, the U.K. Bribery Act and the PCA, and any other anti-corruption laws that are in effect in the

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<sup>1</sup> The term "associated person" is a term of art used in the U.K.'s Bribery Act that applies to employees, agents and subsidiaries acting on behalf of SERT Group.

country in which SERT Personnel operate. In the event of any conflict, the local law will prevail.

- I. The purpose of this Policy is to:
  - (a) set out our responsibilities, and of SERT Personnel, in observing and upholding our position on bribery and corruption; and
  - (b) provide information and guidance to SERT Personnel on how to recognise and deal with bribery and corruption issues.
- J. The Head of Risk, Compliance and Company Secretarial has overall responsibility for ensuring this policy complies with SERT Group's legal and ethical obligations, and that all those under our control comply with it.
- K. The Head of Risk, Compliance and Company Secretarial has primary and day-to-day responsibility for implementing this policy and for monitoring its use and effectiveness and dealing with any queries on its interpretation.
- L. Management at all levels are responsible for ensuring those reporting to them are made aware of and understand this policy and are given adequate and regular training on it.
- M. The prevention, detection and reporting of bribery and other forms of corruption are the responsibility of all SERT Group Personnel.
- N. SERT Group is responsible for keeping financial records and have appropriate internal controls in place, which will evidence the business reason for making payments to third parties. Applicable standards, principles, laws and practices for accounting and financial reporting must be followed strictly. In particular, all reports and records required by management must be completely accurately and timely. In particular, steps should be taken to ensure that no part of any payment is to be made for any purpose other than that to be fully and accurately described in SERT Group's books and records. No undisclosed or unrecorded accounts are to be established for any purpose. False or artificial entries are not to be made in SERT Group's books and records for any reason.
- O. SERT Group may report violations of this Policy to the appropriate supervisory regulatory or law enforcement authorities.
- P. In this Policy, **third party** means any individual or organisation and includes actual and potential clients, customers, suppliers, distributors, business contacts, agents, advisers, and government and public bodies, including their advisors, representatives and officials, politicians and political parties.

## 1. What is bribery?

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- A. A bribe is an inducement or reward offered, promised or provided in order to gain any commercial, contractual, regulatory or personal advantage. To assess whether bribery has been committed, an assessment of what a reasonable person would expect in relation to the performance of the function and/or activity of the person receiving the alleged bribe is conducted.
- B. No SERT Group Personnel shall make, offer to make, or promise to make, payments, or give anything of value, directly or indirectly, to any third party, including without limitation

- any government official<sup>2</sup>, to assist SERT Group in obtaining or retaining an improper business advantage.
- C. “Anything of value” includes cash, gifts, travel expenses, entertainment, offers of employment, provision of free services, and business meals. It may also include event sponsorships, consultant contracts, fellowship support, job offers, and charitable contributions made at the request of, or for the benefit of, an individual, his or her family, or other relations, even if made to a legitimate charity.
- D. If confronted with a request or demand for an improper payment or other violation of this Policy, the request or demand must be immediately rejected and reported to SERT Group’s Head of Risk, Compliance and Company Secretarial. Similarly, if any SERT Group Personnel knows or believes that an improper payment has been or will be made, he or she must also report such payment to SERT Group’s Head of Risk, Compliance and Company Secretarial. SERT Group’s policy is that no adverse employment action will be taken against any personnel in retaliation for reporting a violation or suspected violation of anti-corruption laws or this Policy (see below).

**Examples:**

**Offering a bribe**

You offer a potential client tickets to a major sporting event, but only if they agree to do business with us. This could be a contact in the asset management team of a pension fund or insurance company for example, and the imputation might be that you are trying to procure an investment management mandate or fund investment into an AIF managed by an entity in the SERT Group.

This would be an offence as you are making the offer to gain a commercial and contractual advantage. We may also be found to have committed an offence because the offer has been made to obtain business for us. It may also be an offence for the potential client to accept your offer.

**Receiving a bribe**

A supplier gives your nephew a job but makes it clear that in return they expect you to use your influence in our organisation to ensure we continue to do business with them. This could be a valuation or legal firm for example.

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<sup>2</sup> The term “government official” includes all officers or employees of a government department, agency or instrumentality; permitting agencies; customs officials; candidates for political office; and officials of public international organizations (e.g., the Red Cross). This term also includes government-owned or controlled commercial enterprises such as state-owned or controlled universities, airlines, oil companies, health care facilities, or other vendors.

It is an offence for a supplier to make such an offer. It would be an offence for you to accept the offer as you would be doing so to gain a personal advantage.

### **Bribing a foreign official**

You arrange for the business to pay an additional payment to a foreign official to speed up an administrative process such as the issue of a road closure permit so a crane might be installed to progress construction of an asset.

The offence of bribing a foreign public official has been committed as soon as the offer is made. This is because it is made to gain a business advantage for us. We may also be found to have committed an offence.

## **2. Facilitation payments and kickbacks**

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- A. This Policy does not prohibit facilitation payments where there is a threat to loss of life, limb or liberty and provided that it is promptly reported to the Head of Risk, Compliance and Company Secretarial once practicable.
- B. Facilitation payments are typically small, unofficial payments made to secure, expedite, or facilitate a routine government or administrative action by a government official. Facilitation payments are not commonly paid in the parts of Europe and Singapore where the main operations of SERT Group are, but are common in some other jurisdictions.
- C. Kickbacks are typically payments made in return for a business favour or advantage. All SERT Group Personnel must not engage in any activity that might lead to, or suggest, that a facilitation payment or kickback will be made or accepted by us.
- D. SERT Group does not make, and will not accept, facilitation payments or "kickbacks" of any kind.
- E. For these reasons if you are asked to make a payment on SERT Group's behalf, you should always be mindful of what the payment is for and whether the amount requested is proportionate to the goods or services provided, so as to ensure it does not amount to a facilitation payment or a kickback. You should always ask for prior written information or a receipt that details the reason for the payment to evidence that the payment is not a facilitation payment or a kickback. If you have any suspicions, concerns or queries regarding a payment, for example, if you are concerned that you are being asked to make a facilitation payment or a kickback, you should raise these with the Head of Risk, Compliance and Company Secretarial.

## **3. Donations**

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### **1) Political donations**

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- A. A political contribution is a contribution, financial or in kind, to support a political cause. A political cause can be widely defined and may include political parties, election committees, party affiliated organisations, party aligned research bodies, pressure or lobby groups, causes that are politically aligned, party officers and candidates.

- B. SERT Group's policy is **not** to make political contributions in any form whether to political parties, causes or to support individual candidates. SERT Group Personnel should not make direct or indirect contributions to political parties, organisations or individuals engaged in politics, as a way of obtaining advantage in business transactions or otherwise.

## II) Charitable donations

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- A. SERT Group only makes charitable donations that are legal and ethical under local laws and practices. SERT Group Personnel should ensure that charitable contributions and sponsorships are not used as a subterfuge for bribery.
- B. Where charitable donations are to be made, prior approval should be obtained.

## III) Overseas work

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- A. SERT Group's business activities regularly involve SERT Group having business dealings overseas. The corruption risks associated with overseas work are particularly high where either:
- (a) corruption is prevalent in the country in question; and/or
  - (b) SERT Group is going to be using the services of agents or other intermediaries; and/or
  - (c) SERT Group is going to be working with a third party based in that country; and/or
  - (d) SERT Group is likely to have direct contact with local public officials.
- B. If any of these circumstances apply, it is important that the procedures in the Associated Persons Policy are followed in relation to any person who will be appointed to perform services on behalf of SERT Group or with whom SERT Group will be working jointly.
- C. In addition, you need to remain particularly vigilant and alert to bribery risks in the course of our work in that country. Any activity by local contacts, clients, third parties that gives rise to suspicions of bribery or any requests for or offer of bribes should be reported in accordance with this policy.

## IV) Gifts and Entertainment

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- A. Directors and officers of SERT Group may, in the course of their work, receive or offer gifts or entertainment from/to potential business partners, or other third-party service providers. The handling of gifts and entertainment received or given should be as follows:

Value of gift & entertainment received or given	Inform Risk and Compliance	Approval required
\$100 and below	No	No

\$101 to \$250	Yes	HOD
\$251 to \$500	Yes	CEO

- B. If uncertain about the value of gift or entertainment received, value is to be treated as > \$100 and to declare, record and/or get approval.
- C. **Any deviation from the above due to business needs or circumstances will require declaration and/or approval according to the requirements set out in the policy.**
- D. It is prohibited to receive and/or offer gifts in the form of cash or cash equivalent i.e. shopping vouchers.
- E. The Head of Risk, Compliance and Company Secretarial will maintain, or caused to be maintained, a Register of Gift and Entertainment.

#### 4. Joint ventures

- A. The reputation of SERT Group's business is based on the trust, which investors, clients and employees have in the integrity of its business. For this reason, whenever SERT Group is going to be entering into a joint venture with a third party, it is appropriate to conduct due diligence to be satisfied ourselves that the prospective business partner/s has not been the subject of any prior investigation or enforcement proceedings in relation to corruption and that it has in place its own anti-bribery policies and procedures.
- B. Prior to entering into any joint venture, you should supply a copy of this policy to the business partner/s and ensure that SERT Group's contractual arrangements include appropriate commitments from them not to engage in bribery related activity in relation to the joint venture. You should also require the business partner to join with SERT Group in procuring that the joint venture entity adopts and implements its own appropriate anti-bribery policies and procedures.

#### 5. Suppliers

- A. As well as making sure that no SERT Group Personnel engages in bribery-related activity, you must take reasonable steps to ensure that anyone who becomes aware of any behaviour of concern by a supplier of goods/services to SERT Group (who may not be an associated person) must report their concerns in accordance with this Policy.

#### 6. Internships and Employment

- A. On occasion, relatives of investors of managed funds, sources of finance, clients or government officials may be offered internships or employment. With respect to such internships or employment:
  - (a) if a candidate is interviewed for an internship or employment within the ordinary course of filling a position, the Head of Risk, Compliance and Company Secretarial



must be notified of the relationship between the candidate or his or her immediate family (or an entity with which such family member is employed or otherwise affiliated) and SERT Group; and

- (b) if a candidate (or his or her immediate family member) is employed by or otherwise affiliated with investors or managed funds, sources of finance, clients, or government officials and such candidate is interviewed outside of the ordinary course of filling a position, any internship or employment offer must be pre-approved by the Head of Risk, Compliance and Company Secretarial.

## 7. Risk assessment

- A. SERT Group takes a risk-based and proportionate approach to the prevention of bribery and corruption. In order to do this effectively steps are taken to ensure that we understand and regularly assess the bribery and corruption risks faced.
- B. The bribery and corruption risk assessment process is dynamic. It is reviewed and updated on an ongoing basis as the environment and markets in which SERT Group operates in change and evolve. The findings of the bribery and corruption risk assessment determines SERT Group's overall approach to the prevention of bribery in line with SERT Group's risk tolerance.
- C. SERT Group utilises internal and external sources of information which assists in categorising the bribery risks to SERT Group. Internal sources may include management information relating to employees' completion of anti-bribery training or the results of reviews of third-party relationships. External sources may include the Transparency International's Corruption Perceptions Index to assist in identifying higher-risk jurisdictions or results of reviewing anti-bribery procedures in place in partner firms.
- D. SERT Group's bribery risk assessment takes the following factors into account:

External risk factors	Internal risk factors
The jurisdictions in which we operate	The provision of staff training and testing of the effectiveness of training
The jurisdictions in which our clients reside	Our remuneration policies, and whether you are likely to result in risk taking being rewarded
The industries in which we operate and/or with which we have links	The appropriateness of our corporate gifts and hospitality policy
The types of transactions we deal in	The appropriateness of any charitable or political donations which we make as an organisation
The nature of any business partnerships, joint ventures and intermediary partnerships	The transparency and effectiveness of our financial controls

The nature of any projects in which we are involved	The clarity of message received from senior management with regards to bribery prevention
Any other risks which we identify as possibly arising in the course of our usual business	Any other relevant internal factors which we may consider having a bearing on our bribery risk profile

- E. Once completed, the risk assessment is reviewed on an on-going basis in light of any changes within our business, for example if SERT Group begin to operate in a new, higher-risk industrial sector. Irrespective of this, SERT Group's bribery risk assessment is reviewed and revised as appropriate.

## 8. Responsibilities of SERT Group Personnel

- A. All SERT Group Personnel must ensure that that they have read, understand and agree to comply with this Policy. An annual process exists for SERT Group Personnel in Workday to self-certify their compliance with this Policy.
- B. SERT Group Personnel are required to avoid any activity that might lead to, or suggest, a breach of this Policy.
- C. Any employee who breaches this Policy could face disciplinary action or, if a serious breach, could be dismissed for gross misconduct.
- D. SERT Group Personnel must notify their manager or the Head of Risk, Compliance and Company Secretarial as soon as possible if they believe or suspect that a conflict with this policy has occurred or may occur in the future.

### Example:

- If a client or potential client offers you something to gain a business advantage with us, or indicates to you that a gift or payment is required to secure their business.
- Further "red flags" that may indicate bribery or corruption include:
- you become aware that a third party engages in, or has been accused of engaging in, improper business practices;
- you learn that a third party has a reputation for paying bribes, or requiring that bribes are paid to them, or has a reputation for having a "special relationship" with foreign government officials;
- a third party insists on receiving a commission or fee payment before committing to sign up to a contract with us, or carrying out a government function or process for us;
- a third-party requests payment in cash and/or refuses to sign a formal commission or fee agreement, or to provide an invoice or receipt for a payment made;

- a third-party requests that payment is made to a country or geographic location different from where the third party resides or conducts business;
- a third-party requests an unexpected additional fee or commission to "facilitate" a service;
- a third-party demands lavish entertainment or gifts before commencing or continuing contractual negotiations or provision of services;
- a third-party requests that a payment is made to "overlook" potential legal violations;
- a third party requests that you provide employment or some other advantage to a friend or relative;
- you receive an invoice from a third party that appears to be non-standard or customised;
- a third-party insists on the use of side letters or refuses to put terms agreed in writing;
- you notice that we have been invoiced for a commission or fee payment that appears large given the service stated to have been provided;
- a third-party requests or requires the use of an agent, intermediary, consultant, distributor or supplier that is not typically used by or known to us; or
- you are offered an unusually generous gift or offered lavish hospitality by a third party.

## **9. How to raise a concern**

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SERT Group Personnel are encouraged to raise concerns about any issue or suspicion at the earliest possible stage. If SERT Group Personnel are unsure whether a particular act constitutes bribery or corruption, or if anyone has any other queries, these should be raised with their manager or the Head of Risk, Compliance and Company Secretarial.

## **10. What to do if you are a victim of bribery or corruption**

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It is important that all SERT Group Personnel inform the Head of Risk, Compliance and Company Secretarial promptly if you are offered a bribe by a third party, are asked to make one, suspect that this may happen in the future, or believe that you are a victim of another form of unlawful activity.

## **11. Protection**

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- A. SERT Group Personnel who refuse to accept or offer a bribe, or those who raise concerns or report another's wrongdoing, are sometimes worried about possible repercussions. SERT Group aims to encourage openness and will support anyone who raises genuine concerns in good faith under this Policy, even if you turn out to be mistaken.

- B. SERT Group is committed to ensuring no one suffers any detrimental treatment as a result of refusing to take part in bribery or corruption, or because of reporting in good faith their suspicion that an actual or potential bribery or other corruption offence has taken place, or may take place in the future. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern in good faith.
- C. If SERT Group Personnel believe that SERT Group Personnel have suffered any such treatment, you should inform People & Culture immediately or follow the procedures set out in our Whistleblowing Policy.

## **12. Training, Monitoring and review**

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- A. The Risk, Compliance and Company Secretarial team will monitor the effectiveness and review the implementation of this policy, regularly considering its suitability, adequacy and effectiveness, providing training where appropriate.
- B. Any SERT Group Personnel who have any comments or questions whatsoever concerning the requirements of the U.K. Bribery Act, PCA, local anti-corruption laws, or this Policy should consult with the Head of Risk, Compliance and Company Secretarial.
- C. Internal control systems and procedures will be subject to regular reviews to provide assurance that they are effective in countering bribery and corruption.
- D. Annual compliance training will be conducted. Staff will be required to confirm that they have attended the training session.

## **13. Contacts**

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Head of Risk, Compliance and Company Secretarial: Kathleen Tan

Kathleen.tan@Stoneweg.com.sg

This Policy does not form part of any employee's contract of employment and it may be amended at any time.

## Associated Persons

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### 1. Key Points

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- Associated Persons are third parties who perform services for or on behalf of SERT Group; SERT Group may be held liable for their actions.
- Where there is a greater level of bribery risk attached to working with a particular Associated Person, proportionate due diligence checks should be undertaken on that Associated Person before you are engaged and, except in the case of urgency, sign a written contract before you perform any services for SERT Group.
- We must be alert to potential signs of improper conduct involving Associated Persons (“red flags”) and investigate them further as appropriate.
- We must always verify that invoices from Associated Persons are properly documented and contain only legitimate charges.

### 2. What is an “Associated Person”?

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“Associated Person” is a term from the U.K. Bribery Act; it is an individual or company that performs services for or on behalf of SERT Group. The capacity in which a person performs services on behalf of SERT Group does not matter. Note that SERT Group’s Policy applies to all Associated Persons, regardless of the Associated Person’s citizenship, nationality or residency. Examples of Associated Persons include:

- property and sales agents
- local representatives;
- contractor or sub-contractors;
- consultants; and
- any other individuals or companies who may act on behalf of SERT Group or perform services for SERT Group.

### 3. Is SERT Group responsible for the actions of its Associated Persons?

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Yes, if an Associated Person is making improper payments on SERT Group’s behalf, SERT Group may be held responsible for the Associated Person’s actions. Therefore, it is important for each of us to be alert for signs that are often associated with bribery and corruption. Such signs are called “red flags” and are discussed more fully below. Acting with wilful blindness by “looking the other way” or “burying your head in the sand” and ignoring red flags will not reduce SERT Group’s liability for corrupt activity by an Associated Person.

### 4. What is required prior to working with an Associated Person?

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SERT Group is committed to taking a **proportionate and risk based approach** to **due diligence** of its Associated Persons. Accordingly, before an Associated Person performs any services for or on behalf of SERT Group, the SERT Group employee responsible for the engagement is responsible for conducting a **risk assessment** – that is an assessment of the risks for the Associated Person to commit bribery on behalf of SERT Group. Where the assessment indicates that there are risks for corruption to occur, it may be appropriate to

undertake further **due diligence** on the Associated Person and its activities. As part of this due diligence process, the Head of Risk, Compliance and Company Secretarial or his or her designee shall prepare, approve and maintain, as appropriate, the Associated Person Due Diligence Checklist.

## **5. What about our contracts with Associated Persons?**

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Standard anti-corruption clauses should be included in contracts with Associated Persons where reasonably practicable to do so, given the circumstances of the case.

## **6. After the Associated Person is engaged, do I have any additional responsibilities?**

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Yes, if your job involves reviewing or approving invoices for Associated Person, you must verify that all charges are properly documented and legitimate. In addition, you must always be aware of potential red flags and report them to the Head of Risk, Compliance and Company Secretarial.

If you become aware of any behaviour by an Associated Person or one of its affiliates, directors, officers, employees, agents or representatives or any other person acting on behalf of the Associated Person, you must notify the Head of Risk, Compliance and Company Secretarial.

## **7. What are examples of “Red Flags”?**

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Red flags are certain actions or facts that should alert you that there is a high possibility of improper conduct by an Agent. A red flag does not mean that something illegal has happened, but rather that further investigation is necessary. Red flags are highly fact-dependent, but some examples of red flags are:

- accusations of improper business practices by the Associated Person;
- familial or other relationships between any SERT Group employee or representative and an Associated Person;
- an Associated Person related to or recommended by a foreign government official;
- a foreign government official or their representative demands retention of a particular party or suggests that such retention will make it easier to obtain business;
- an Associated Person requests to be paid in cash or in a third country;
- invoices are not adequately documented or are higher than normal;
- an Associated Person has past convictions or charges for violating local laws;
- Associated Person’s insistence upon receiving a commission payment before the announcement of a contract or decision;
- payments for unspecified services or otherwise questionable services;
- commissions, fees or bonuses that are out of proportion to the value of services rendered (e.g. “success fees”);
- demands for lavish entertainment, gifts or travel in connection with negotiations;
- unreasonable refusal to co-operate in SERT Group’s implementation of this Policy.

Red flags are important because a company can be responsible for the corrupt acts of an Associated Person, even if the company was unaware that a bribe had been given. Red flags are warning signs about potentially improper conduct.

If you have any questions about this Policy, please contact the Head of Risk, Compliance and Company Secretarial:

Kathleen Tan [Kathleen.tan@Stoneweg.com.sg](mailto:Kathleen.tan@Stoneweg.com.sg)

## Associated Persons Due Diligence Checklist

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### (To Be Completed By SERT Group Employee)

Date: \_\_\_\_\_

SERT Group Employee Name  
\_\_\_\_\_

#### Associated Person General Information:

Name: \_\_\_\_\_

Territory: \_\_\_\_\_

Products or Services Covered: \_\_\_\_\_

Past Experience with SERT  
Group or Affiliates: \_\_\_\_\_

Source of Referral: \_\_\_\_\_

Please attach Corporate Establishment Documents

#### Associated Person's Role

Nature of Business: \_\_\_\_\_

Scope of Products/Services: \_\_\_\_\_

Size/Volume of Business: \_\_\_\_\_

Other Comments/Explanations. Include discussion of how compensation, invoicing, and pricing structure are reasonable in relation to the services to be performed and attach documentary evidence supporting the discussion.

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### Detailed Information

Company Name \_\_\_\_\_

Street Address (P.O. Box insufficient) \_\_\_\_\_

Mailing Address \_\_\_\_\_

Telephone Number \_\_\_\_\_

Facsimile Number \_\_\_\_\_

Internet Address \_\_\_\_\_

Principal Contact Name \_\_\_\_\_

Phone Number of Principal Contact \_\_\_\_\_

Legal Status of Company (Partnership, Corporation, etc.): \_\_\_\_\_

Date and Place of Establishment: \_\_\_\_\_

Ownership: Is company privately or publicly held? If privately held, please indicate the following:

Owner(s)

Nationality

Percent Ownership

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Management and Responsible Individuals:

**Directors:** \_\_\_\_\_

**Manager of SERT Group's Account:** \_\_\_\_\_

### Financial Statement

Obtain company financial statements (audited, if available) for the past three years, including balance sheets and profit and loss statements.

### Legal proceedings

Have you done an internet search on whether the Associated Person (or any employee, director, officer or other person) or any affiliate of the Associated Person, has been the subject of past or pending legal, arbitral, or regulatory proceedings in its jurisdiction in relation to bribery or corruption practices? If yes, contact Head of Risk, Compliance and Company Secretarial.

### Government Affiliation

Is the Associated Person **(or any employee, director, officer or other person)** or any of its affiliates or principals also a government official, affiliated or employed by a state/government sponsored entity, political party official or candidate for political office? If yes, contact Head of Risk, Compliance and Company Secretarial.

