



Emerging Risks Global ABC Policy

Many national and international organisations including the Organisation for Economic Co-operation and Development (OECD) and the United Nations (UN) are working to combat bribery and corruption in the public and private sectors in countries around the world.

Emerging Risks Global and the wider Woodlands International Ltd. Group is committed to protecting the business, its employees; shareholders and customers from money laundering, bribery and corruption. ERG requiring for all parties to conduct business in accordance with applicable AML laws, rules, and regulations.

Policy Statement

Emerging Risks Global is committed to maintaining high standards of ethical behaviour and maintains zero tolerance towards bribery and corruption. ERG requires compliance with all anti-bribery and corruption laws in all markets and jurisdictions in which it operates. These laws include the UK Bribery Act, the US Foreign Corrupt Practices Act, as well as other similar laws and regulations in the countries where we operate.

All activity:

- Must be conducted without intent to bribe or corrupt;
- Must be reasonable and transparent;
- Must not be considered lavish or disproportionate to the professional relationship;

- Must be appropriately documented with business rationale; and
- Must be authorised at an appropriate level of seniority.

Must not:

- Offer, promise, give or authorise others to give or agree with anyone else to offer, promise, give or authorise others to give, anything of value, directly or indirectly, to any party, or to influence any Public Official; or
- Solicit or receive anything of value, directly or indirectly, from any party; or
- Offer or provide a facilitation payment (exceptions may be permitted in limited circumstances where an employee's health, safety and/or liberty is at risk); in order to improperly obtain or retain business or otherwise gain an unfair advantage in business.

All ERG employees are required by policy to have appropriate controls in place to manage risks and maintain records when offering or accepting gifts, entertainment, sponsorships, travel & accommodation or other advantage or when engaging in charitable giving, political expenditure or recruitment.

Recruitment must be merit-based, fair, and in keeping with the stringent hiring standards applied by ERG. Hiring, in paid or unpaid, temporary or permanent roles, must not be used to improperly influence third parties or to improperly obtain or retain business or an advantage in business.

Third Party Risk: Appropriate due diligence and controls are applied to any third parties engaged, to ensure that they comply with the letter and spirit of applicable anti-bribery legislation and regulation.

Where necessary, justified, legal and proportionate;

- The company conducts customer due diligence practices and incorporates customer Identification and Verification (“ID&V”) and Know Your Customer (“KYC”) principles.
- Conducts enhanced due diligence (“EDD”) on customers assessed as higher risk, such as Politically Exposed Persons (“PEPs”) in senior positions, their relatives and close associates.
- Establishes processes and systems designed to monitor customer activities for the purpose of identifying suspicious activity
- Investigates and subsequently reports suspicious activity to the appropriate regulatory bodies
- Conducts mandated regular independent testing and regular AML training of its employees and contractors
- Prohibits engagement with the following products, services and customer types:
 - Anonymous accounts or numbered accounts.
 - Shell banks, i.e. banks with no physical presence or staff
 - Hold Mail, i.e. where the customer has instructed all documentation related to the account are to be held on their behalf until collection

Emerging Risks Global is committed to complying with the sanctions laws and regulations of the United Kingdom, European Union, Hong Kong, the United Nations, and the United States, as well as other applicable sanctions laws and regulations in the jurisdictions in which ERG operates, subject to the primacy of local laws and regulations.

Reviewed 02 February 2021