



# Business Integrity

## Introduction

Canary Wharf Ltd (C.W) conducts its business in an honest and ethical manner and in compliance with the laws and regulations applicable in the countries in which it operates.

The scope of this Policy is global and it applies to all directors, employees, contractors and consultants of CW. Any reference to CW includes its subsidiaries and affiliates, including any individual mines that transact in their own names.

## Principles

### We adhere to all applicable laws, regulations and standards.

We comply with all laws, regulations and standards that are applicable to our business and activities in all countries in which we operate and any other requirements to which we have committed. We will not engage in unlawful or inappropriate conduct, and we will not condone, instruct or induce others to do so.

### We have zero tolerance for all forms of bribery and corruption.

We prohibit and take active steps against fraud and corruption in all its forms, including bribery and extortion. Bribery is not limited to cash payments; it is anything of value including, but not limited to, gifts, vacations, meals, favours, offers of employment or influence as a means of influencing the actions of the recipient.

We do not tolerate any employee, contractor, consultant or person working on behalf of CW offering, paying, soliciting, receiving or accepting any bribes, kickbacks or other prohibited payments or activities. We prohibit facilitation payments to expedite approvals processes in support of any CW contract or activity.

### We comply with all applicable trade controls.

We comply with all applicable trade sanctions, export controls and anti-boycott laws and will not participate in trade or financial transactions that may expose CW to criminal or civil penalties, or otherwise cause damage to our reputation.

### We do not allow gifts or hospitality to improperly influence our decisions.

While we recognise that giving and receiving gifts and entertainment is part of the business culture in some countries in which CW operates, it is essential that there should be no underlying motive to illegally or improperly influence a transaction, decision or activity by the giving or receipt of gifts, hospitality and entertainment.

All gifts and hospitality given or received must be registered and, if over US\$100 (or local currency equivalent) in value, approved prior to giving or receiving as set out in the relevant standard.

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Any financial contributions that we make will be compliant with the applicable laws and regulations of the countries in which we operate and in line with our commitment to transparency, public disclosure and good governance. We prohibit making political donations on behalf of CW.

**We avoid conflicts of interest.**

We require our employees and contractors to always act in the best interests of CW and perform their duties honestly and transparently. We avoid situations in which the interests of CW and our employees' conflict or may be perceived to conflict.

A conflict of interest may arise when an employee's position in the company and their personal or financial interests affect, or could be seen to affect, or have the appearance of affecting their judgement, objectivity or independence. We disclose, review and manage any actual or perceived conflict of interest and prohibit employees from discussing, negotiating, influencing or making decisions on any activity in which they have a personal interest or might be perceived to have a personal interest.

**We are honest in our dealings with the market.**

We provide timely, factual and accurate disclosure of material information about CW. We publicly disclose material information pursuant to the listing requirements in each jurisdiction in which we operate and take steps to prevent improper disclosure.

We do not deal in the shares of CW or any other company while relying on inside information that has not been disclosed to the market and we do not disclose inside information to others for the purposes of dealing in the shares of CW. We apply additional trading restrictions to officers and employees who may have access to financial results before they are publicly disclosed.

**We promote fair competition.**

We do not use confidential or proprietary information or interact with our competitors in a way that would be contrary to the applicable antitrust laws in the countries in which we operate. We avoid relationships with our competitors that could be perceived as collusive or improper.

**We safeguard personal, confidential and proprietary information.**

We treat the personal information we collect, store and process in an appropriate and lawful manner and we take reasonable steps to protect that information from unauthorised access, disclosure and misuse. We are committed to compliance with the requirements of applicable data protection laws and regulations in the countries in which we, or a third-party supplier on our behalf, processes personal information. We do not collect, process or transfer sensitive personal information of our employees or contractors except where adequate privacy protection mechanisms are in place.

**We maintain accurate books and records.**

We keep accurate and reliable records to meet our legal and financial obligations and to manage affairs of CW. Our books of account and financial records reflect all business transactions in an accurate and timely manner.

**We maintain a speak up culture.**

We are committed to a culture of openness, transparency and accountability and encourage all employees, contractors or consultants to speak up if they identify or suspect any practices that conflict with CW's values and business principles.

We maintain effective mechanisms to receive, review and expeditiously deal with any reports of unlawful conduct, financial malpractice, dangers to the public or the environment or any other

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practices that conflict with CW's values and business practices. We prohibit retaliation against any person who raises an issue or concern in good faith.

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