



SAVANNAH ENERGY

Delivering *Projects that Matter*

Procedure - Global

**PRD.CMP.ACM.001 - Anti-Bribery, Corruption and
Money Laundering**

Date: 18/03/2025 Revision: 1.0



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Approval

The signatures below certify that this document has been reviewed and accepted and demonstrates that the signatories are aware of all the requirements contained herein and are committed to ensuring their provision.

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Amendment Record

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1. INTRODUCTION

These Anti-Bribery, Corruption and Money Laundering Procedures set out the actions that will be taken by Savannah Energy Plc (“Savannah”) to drive compliance with our Anti-Bribery, Corruption and Money Laundering Policy (the “Policy”). These procedures should be read in conjunction with the Policy.

These procedures apply irrespective of the country in which business is being conducted. Where there are differences between the local law and these procedures, you must apply either the procedures or the local law, whichever sets the highest standard of behaviour.

These procedures are important because they support the identification and management of bribery, corruption and money laundering risk through the implementation of risk-based controls.

2. TRAVEL BENEFITS, GIFTS AND HOSPITALITY

Bona fide hospitality and promotional or other business expenditure which seeks to enhance the image of Savannah, better present its operations, or establish cordial relations, is recognised as an established and important part of doing business.

It is not the intention of the applicable laws to criminalise such behaviour. However, it is clear that hospitality and promotional or other similar business expenditure can be employed as bribes.

In order to ensure compliance with the applicable laws and our Policy, it is necessary to consider, on a case-by-case basis, whether the intended recipient of a travel benefit, gift or hospitality may be induced, or feel obliged, to reciprocate by way of improperly performing his or her function. This may be more likely if the travel benefit, gift or hospitality in question is disproportionately generous. If it is reasonable in the circumstances, it shall be more difficult to establish whether by giving it, it is intended to induce the recipient to perform his or her function improperly (however please see below the approach for dealings with public officials which raise a heightened concern).

No travel benefit, gift or hospitality shall be given in exchange for a business benefit or any improper business advantage. Nor should it be given if it is intended to influence, or could be perceived as influencing, a business decision by the recipient.

Any gift must be in accordance with applicable laws and local laws, modest in value, promotional in nature, appropriate for the occasion and customary or ceremonial in nature. Where practicable, it is



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recommended that gifts bear the company logo. Cash gifts to or from business contacts are expressly prohibited, as are cash equivalents, such as gift vouchers.

An Employee may receive from his or her business contacts, or offer or give to a person - who is not a public official (on which see below) - any gift or hospitality which does not exceed £100 in value for each individual gift or £500 in value per head for each hospitality event (not to exceed a total value of £500 in gifts or £2500 for hospitality per person in any financial year). Any such gift (beyond promotional branded merchandise below £50 in value) or hospitality (that is not a refreshment associated with a meeting) received or given shall be recorded in Savannah's Gift & Entertainment Register located in SAP Concur or Flowcentric as applicable by location.

Employees who wish to offer or give or receive a gift or hospitality which does not fall within the above criteria must seek and obtain pre-approval from Compliance. Requests for approval for this purpose should be made in writing (via email) to compliance.SAVE@savannah-energy.com. Requests must include the following information:

- date of the proposed hospitality/gift;
- names of each provider(s) and each recipient(s) of the hospitality/gift;
- the nature of the hospitality/gift (for example, 'wine tasting event at [x]');
- the purpose of the hospitality/gift (for example, 'developing a business relationship with [x]');
- the 'per head' spend on each non-company recipient;
- confirmation that no public officials are the recipient or connected (as far as known) to the recipient of the gift / hospitality; and
- confirmation that the offer or acceptance of the hospitality/gift is not intended, nor could it be perceived as intended, to influence a decision-maker to award or obtain a business advantage improperly (for example that, as far as the person making the request is aware, there is no forthcoming pitch, tender, contract renewal or other formal decision process).

Compliance may, at its discretion, require further information to be provided as it considers necessary before making a decision.

Any provision of travel or lodging for those who are not Savannah Employees must be properly recorded in the Gifts and Hospitality Register. Employees shall select the third parties to whom travel or lodging shall be provided, and shall confirm in writing with the selected third party's supervisor the nature and duration of the travel or lodging. In no case shall Employees personally pay for or



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reimburse the travel or lodging of the family or friends of the third party. Savannah shall not fund or reimburse any 'side trips' for third parties.

3. INTERACTIONS WITH PUBLIC OFFICIALS

A higher degree of bribery, corruption and money laundering risk exists when engaging or interacting with public officials who may be in an actual or perceived position of influence which could affect our business.

We will not influence any public official to obtain or retain business or an advantage in business. We follow applicable written standards, laws, regulations and codes of conduct when engaging or interacting with public officials.

Definition of Public Official:

Public officials are defined broadly as:

- Any officer or employee of a government or any ministry, department or agency, (which includes public enterprises, and entities owned or controlled by the state);
- Any officer or employee of a public international organisation (for example, the World Bank, United Nations, Organisation of Africa Unity or Economic Community of West Africa States etc);
- Any officer or employee of a political party, or any candidate for public office;
- The police and other security agencies, such as immigration and border controls;
- The armed forces;
- Any person defined as a government or public official under applicable local laws (including anti-bribery and corruption laws) and not already covered by any of the above; and / or
- Any person acting in an official capacity for or on behalf of any of the above.

The term government refers to all levels and sub-divisions of governments i.e. local, regional, national or administrative, legislative, executive, judicial and royal families.

We extend the definition of public official to any person with close family members who are public officials with the capacity, actual or perceived, to influence or take official decisions affecting Savannah's business.



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Record keeping – Interaction with Public Officials

Records should be maintained of interactions with public officials in relation to Savannah’s business activities. For example, records should be maintained of face to face meetings, lunches and dinners; and telephone calls with public officials involving discussions relating to Savannah’s business activities (including potential and completed business activities). Records of interactions with public officials in a purely personal capacity do not require to be maintained as long as they do not involve Savannah business activities (including potential and completed business activities).

Compliance may, at its discretion, require the provision of a copy of records of interactions with public officials.

Records should include:

- The name, role & details of the public official (including ministries, agencies and departments);
- The purpose of the interaction; and
- Brief summary of discussion & action points (if applicable).

Policy Regarding Benefits to Public Officials

Employees must not offer or give any travel benefit, per diem, gift or hospitality to any government/public official, except that:

- a) gifts may be given to such persons on or around a recognised gift-giving period if i) the nature and value of the gift conforms with local norms, ii) the process detailed above is followed, and iii) there is no forthcoming or potential pitch, tender, contract renewal or other formal decision process linked directly or indirectly to that public official; and
- b) a travel benefit, per diem, gift or hospitality may be given to such persons with the formal & written pre-approval of the Chief Compliance Officer or the designate. The Chief Compliance Officer or designate will consider matters including:
 - I. the nature and value of the travel benefit, per diem, gift or hospitality;
 - II. the circumstances of the occasion;
 - III. the legality of the provision of the travel benefit, per diem, gift or hospitality under applicable laws and local law;
 - IV. the frequency of travel benefits, per diems, gifts or hospitality to any particular public official; and



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- V. whether any travel which is at the invitation or request of Savannah is for a bona fide business purpose or in the performance of a particular contract.

If the Chief Compliance Officer or the designate gives approval, the travel benefit, per diem, gift or hospitality must be properly recorded in the Gifts and Hospitality Register.

Facilitation payments and kickbacks

Savannah makes no distinction between bribes and so-called "facilitation" or "grease" payments. Facilitation payments are typically small unofficial payments paid to speed up an administrative process (outside of documented lawful fast track processes) or secure a routine government or local authority action by an official.

It is important that all Employees are able to recognise where a payment might be a facilitation payment.

Facilitation payments are treated as bribes by the UK Bribery Act, and other laws, and are prohibited by Savannah.

The security and safety of our staff and third parties engaged by us are a priority. If at any point during a demand for a bribe, there is a threat to life or liberty, then the payment may be made but it must be reported to the Chief Compliance Officer as soon as practicable and documented accordingly.

4. USE OF COMPANY ASSETS AND ACCURACY OF FINANCIAL RECORDS

Savannah requires that all financial transactions be accurately reflected in the company's financial records and in accordance with generally accepted accounting principles.

Savannah and its employees, and its Service Providers and Business Partners in relation to the business and operations of Savannah, are prohibited from maintaining undisclosed or unrecorded funds or assets established for any purpose. Examples of undisclosed or unrecorded funds or assets include, but are not limited to, the following:

- a) numbered bank accounts (being accounts not attached to the name of an individual or entity, but to a number);
- b) bank accounts containing company funds but held in the names of individuals;
- c) unrecorded petty cash or 'black box' funds; and
- d) real and personal property held by a nominee.



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5. PROHIBITED MEANS OF PAYMENT

Payments to any third parties are not permitted unless an approved contract is in place. No payments shall be made in cash, to numbered accounts (being accounts not attached to the name of an individual or entity, but to a number), to third-country accounts or to third-party accounts unless specifically authorised by the Group Chief Financial Official and / or the Head of Finance in country, who shall liaise with the Chief Compliance Officer or Country Compliance Manager as applicable. All payments must be supported by properly documented invoices.

Cheques may only be written to 'cash' or 'bearer' where Savannah has received an invoice in respect of the relevant payment and a receipt from the payee. Such payment, together with copies of the relevant invoice and receipt, must be properly recorded in the corporate books.

6. CHARITABLE DONATIONS AND POLITICAL CONTRIBUTIONS

Employees are only permitted to utilise Savannah assets or resources for charitable donations subject to the express authorisation of the Chief Compliance Officer who shall base any such approval on the law of the jurisdiction where the donation is to be made, considering the amount, timing, and means of the contribution. The Chief Compliance Officer shall maintain records of any such approvals.

Savannah does not make political contributions or sponsor political meetings or conventions. Employees must not attend political fundraising events on behalf of Savannah but may do so in a private capacity.

Savannah does not sponsor social events at political meetings, conferences, or conventions.

Employees may attend such events and the company pay for the cost of attendance if:

- I. Social event is incidental,
- II. Intent of the social event is not to raise funds,
- III. Costs are moderate, and
- IV. There is a valid business justification for attending the meeting.



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7. DOING BUSINESS THROUGH INVESTMENTS OR TRANSACTIONS WITH BUSINESS PARTNERS, INCLUDING COUNTER PARTY DUE DILIGENCE

Savannah's goal is to only do business with counterparties engaged in legitimate business activities and who derive their income, wealth, funds and investable assets from legitimate sources. By dealing only with such counterparties who are known to the company through the implementation of proper due diligence efforts, the company can minimise the risk of transacting business with, or entering into joint ventures with, or on behalf of, a person engaged in bribery, corruption, money laundering or other illicit activities.

Savannah requires that all investments and transactions involving its Service Providers and Business Partners be memorialised in writing. Any proposed business transaction involving public officials, state-owned businesses or other higher risk parties shall be subject to enhanced due diligence (on which see below) and must be approved by a member of the Compliance Committee. Examples of higher risk parties include:

- Counterparties with opaque or complex corporate structures and where the ultimate beneficial ownership is not clear;
- Counterparties located in, or trading in, countries that present an increased corruption risk (you may refer to Transparency International's Corruption Perception Index which rates each country by reference to its perceived level of corruption), are subject to comprehensive sanctions regimes (these include Crimea, Iran, Libya, North Korea, Russia, Sudan, Syria, Non-government controlled regions of Ukraine, Belarus) or have been identified has higher risk from a money laundering or terrorist financing (you may refer to the Financial Action Task Force's "High-Risk Jurisdictions subject to a Call for Action");
- Counterparties that will interact with public officials / stated owned businesses for or on behalf of Savannah;
- Counterparties engaged on commission arrangements.

Compliance may require on a periodic basis that Savannah employees and business partners and service providers which are required to do so under the terms of their employment or engagement with Savannah provide a '*certificate of compliance*' to the Chief Compliance Officer, certifying that they have read and understood, and that they agree to comply with, this policy and all applicable laws.



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Service Providers and Business Partners should be carefully selected, subject to contractual controls and monitored. We adopt a risk-based approach to due diligence and, where warranted by the risk, will undertake enhanced bribery and corruption, money laundering and sanctions due diligence.

The management of our third parties (including Service Providers and Business Partners) risk requires the following steps depending on the risk they face:

- Due Diligence: ensure and document that there is:
 - Business Justification (reason for engaging the third party,
 - Selection process
 - Fair Market Value or Proportionality assessment
 - Background check (Due Diligence) including checking that the third party is not on any global sanctioned or prohibited list; including Savannah's list of blocked 3rd parties
 - Check and resolution of any conflicts of interest
 - Due diligence is refreshed as appropriate to maintain adequate oversight of our third parties in line with the Supply Chain Procedure
 - Contract: inclusion of Anti-Bribery & Corruption and sanctions clauses to contracts and purchase orders
 - Training of relevant third parties
 - Monitoring

Savannah has tailored its third party due diligence procedures, referred to as the Third Party Risks Management Standard included at Appendix 1 to support a risk based approach, and address the potential bribery, corruption, money laundering or other illicit activities that may be associated with particular types of counterparties, jurisdictions, business lines or methods of doing business.

The User Department or Business Owner responsible for engaging the third party is responsible for carrying out due diligence and assessing and managing the corruption risk in line with the Third Party Risk Management Standard. The Business Owner/User Department must ensure that any red flags identified prior to, and during the engagement, are mitigated or resolved.

8. AUTHORISED DISCLOSURES

Liability for money laundering offences under Part 7 of the UK Proceeds of Crime Act 2007 and other potentially applicable laws can be avoided through the making of a disclosure (referred to in the UK



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as a defence against money laundering) to the relevant authorities and receiving their clearance **before** the proposed activity - known as a '*Defence Against Money Laundering*'.

If you have any money laundering concerns these must be reported to *Chief Compliance Officer*. If you suspect that money laundering is taking place you **must not disclose** any material information to anyone that might prejudice any investigation.

9. RECORDS RETENTION

Savannah shall maintain copies of all records and communications to document the implementation and operation of these procedures, as considered appropriate and for as long as it considers appropriate, and at all times in compliance with applicable laws.

Confidential records shall not be disclosed other than as permitted or required by law.

10. TRAINING

Corruption prevention training is mandatory for all Savannah Energy Employees. It shall take the form of education and awareness raising about the threats posed by corruption in general and in the energy sector in particular.

More advanced training may (on a needs basis) be provided to certain Savannah Energy Employees, tailored to the specific risks associated with specific roles. Refresher training shall be provided from time to time as required and at least every twelve months.

Savannah shall also, where appropriate, provide such prevention training to Service Providers and Business Partners who represent a higher degree of risk from a corruption perspective. Alternatively, Savannah may request the Service Provider / Business Partner to confirm that they have received corruption training within the six months prior to the time of engagement and to provide the company with proof of training.



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11. NOTIFICATIONS OF SUSPECTED VIOLATIONS

Any suspected violation of applicable laws, this policy and / or related procedures should be immediately brought to the attention of as line manager. If a report to a line manager is not possible, reports can be made to the Chief Compliance Officer or the Head of HR.

Alternatively, any suspected violation can also be reported through the independent “Speak Up” whistleblowing hotline portal which can be accessed through the Compliance Folder located on the Intranet or via the following free toll lines:

- United Kingdom – 0800 048 8465
- Niger – (503) 748-0479
- Nigeria - 0-708-060-1816 followed by (844) 951-1992

For further information please see our Whistleblowing Policy.

Savannah is committed to an environment where open, honest communications are the expectation - not the exception - and everyone is encouraged to report any concern in the certainty that the issue will be independently reviewed and responded to appropriately. On receiving any report, the Chief Compliance Officer, together with the Compliance Committee, will take further action deemed necessary and appropriate, including considering whether to engage legal counsel to conduct a confidential investigation.

12. CONSEQUENCES OF NON-COMPLIANCE

We may take appropriate disciplinary action, up to and including termination of employment, against any employee who fails to comply with these procedures, applicable laws or our wider policies and procedures. In addition, employees who break the law may be reported to law enforcement and may face criminal proceedings, fines or imprisonment.

We will not deal with Service Providers and Business Partners that act contrary to the principles set out in our Code, policies or that expose us to risk of committing offences.

13. DEALINGS WITH LAW ENFORCEMENT

Savannah is committed to cooperating with law enforcement and governmental authorities in accordance with applicable laws, and with due consideration for the privacy of clients and transaction counterparties. Dealings with law enforcement and governmental authorities where



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there is any allegation, however remote and regardless of whether it is considered unfounded, should be escalated to the Chief Compliance Officer and/or the General Counsel

14. ROLES AND RESPONSABILITIES

- **Chief Compliance Officer**

The Chief Compliance Officer shall be responsible for overseeing implementation of these procedures and may delegate/assign the responsibility for overseeing implementation at the country level to the Country Compliance Managers. Such responsibilities include (but is not limited to) the following:

- a) Driving the maintenance and periodic review of the
 - a. corporate Gift & Entertainment Register;
 - b. Conflict of Interest Log;
- b) Driving the conduct of risk assessments and the appropriate level of due diligence on Service Providers and Business Partners with whom Savannah is proposing to enter into contracts.
- c) Notifying and requesting a determination from the Compliance Committee in all cases where a high risk of bribery, corruption or money laundering has been identified.
- d) Provide assistance or make a determination (as appropriate) in respect of any matter referred by the Group Chief Financial Officer or Country Head of Finance ;
- e) Overseeing and directing (as appropriate) the investigation of possible violations or legal issues relating to applicable laws, policies or procedures;
- f) Consulting with the General Counsel, as appropriate, to address enquiries regarding, or violations of applicable laws, policies or procedures;
- g) Informing the Chief Executive Officer, Group Chief Financial Officer and, as appropriate, the Board of Directors or Compliance Committee of possible violations or legal issues;
- h) Making recommendations to the Chief Executive Officer and, as appropriate, the Board of Directors or Compliance Committee, as to appropriate action to take to address possible violations of this policy;
- i) Overseeing an implementing corruption prevention training; and
- j) Providing a quarterly compliance report to the Board of Directors "Compliance Committee" (See 'Annual Compliance Review' below).



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- **Compliance Committee**

Any issues, based on potential risk / risk exposure that may arise in relation to our policies and procedures shall be raised with, considered and addressed by the Compliance Committee.

- **Employees**

All Staff must read and observe the requirements of the Policy and these procedures. Staff must also act with honesty and integrity and comply with all applicable laws, whether or not specifically covered by the Policy, these procedures, the Code of Ethics and Business Conduct or any of our other policies.

- **Business Partners and Service Providers**

All Business Partners and Services Providers are expected to act in accordance with the principles set out in the Policy and to have in place equivalent procedures to ensure compliance.

15. ONGOING MONITORING AND REVIEW

The Chief Compliance Officer shall conduct a periodic review to determine whether the Policy and these procedures are fit for purpose, are being fully complied with and properly implemented.

Periodic reviews review shall be presented to the Compliance Committee and/or the Chief Executive Officer as appropriate.

More frequent reviews may be warranted if a perceived change in risk profile is identified.

16. WHO CAN I CONTACT IF I HAVE ANY QUESTIONS?

If you have any questions about anything in our Policy or these procedures, please contact your line manager, Chief Compliance Officer, Country Compliance Manager and/or the General Counsel



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17. APPENDIX 1 - THIRD PARTY RISKS MANAGEMENT STANDARD

Initial Business Justification and Third Party Identification (Step I)

Savannah must assess and document the legitimate business need and justification for engaging a new third party in line with the Group Supply Chain Management Procedure.

Due Diligence and Internal Risk Rating Process (STEP II)

Before entering into a contractual relationship with a Third party/ Counterparty, Savannah shall carry out a Due Diligence/Background check on the potential third party.

Requests made as part of the due diligence process should involve direct communications with the third party, specific database & software such as Refinitiv & World check, internet-based research and, where appropriate, the use of a third party due diligence provider.

Any concerns regarding findings from the due diligence process (or otherwise) relating to a third party service provider shall be provided by the Chief Compliance Officer.

For all counter-parties the following information shall be ascertained:

- a) legal name and contact details of the third party;
- b) if the third party is an individual, his or her date of birth and employment status;
- c) if the third party is a corporate entity its registered address, details of its ownership structure and details of any party with an ownership interest of more than 10%;
- d) bank account details (including full name and location of bank);
- e) details relating to the proposed method for payments;
- f) if a public official or any family relation of a public official has an ownership interest in the third party;
- g) if a public official or any family relation of a public official recommended the third party to Savannah;
- h) if there are any sanctions or trade restrictions against the third party (or against its owners or controllers (directors or equivalents)) ;
- i) if the third party intends to utilise a particular employee or third party to carry out work on its behalf, and if so the relevant details;
- j) a review of the third party's company brochures or website materials (if available);



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- k) a Google search for international and local press accounts to see if the third party has been in the press associated with an ethical or corruption scandal; and
- l) a World Check search on the third party and its owners / controllers if it is a corporate entity,
- m) In respect of Counterparties whose shares are publicly traded on one or more of the following stock exchanges: (i) New York Stock Exchange, (ii) NASDAQ OMX, (iii) London Stock Exchange, (iv) Tokyo Stock Exchange, or (v) Shanghai Stock Exchange, only the information set out in above (a), (c), (d), (f) - (l) needs to be ascertained.

Internal risk rating

An internal risk rating of 'Low', 'Medium' or 'High' shall be assigned to each third party upon undergoing the due diligence. If a third party is required to undergo "Enhanced Diligence" based on the outcome of the initial checks or the nature of transaction (including jurisdiction), the Chief Compliance Officer may engage the services of an investigative agency/consultancy firm to carry out an enhanced check and upon satisfactory completion, a final internal risk rating of 'Low', 'Medium' or 'High' shall be assigned to the third party based on the outcome of the Enhanced Diligence process.

Enhanced Due Diligence – Process

Any third party which is required to undergo an enhanced due diligence shall be subject to a further set of Enhanced Diligence questions and scope so that Savannah can fully assess the suitability of the third party for the proposed work and identify any specific areas of risk.

The Enhanced Diligence questions shall be informed by the findings of the initial due diligence exercise and as such, the questions will be tailored according to the areas of risks identified which may include, but shall not be limited to, requesting:

- a) the full names and dates of birth of persons who have ownership interests in the third party of 10% and if considered appropriate, citizenship information and CVs;
- b) details of how the third party is organised and confirmation that the third party has been validly incorporated and registered under local laws;
- c) details of any parent companies or trusts;
- d) details of the third party's business activities, key clients/contracts and geographical areas of operations;



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- e) if the third party has any past criminal convictions (especially in the areas of tax evasion or bribery); any bankruptcies; and any cases of civil litigation in which the third party has been a defendant;
- f) audited financial statements or tax returns if available, or at least a financial reference in cases where there is any doubt as to the third party's ability and resources to provide the services in question; and
- g) the following information, with supporting documentation:
 - I. a reasonable number of business references (if applicable) so that Savannah may have an independent account as to the third party's effectiveness, standing in the community and reputation for ethical business practices; and
 - II. if financial statements or tax returns are unavailable or do not provide a complete picture, financial references from the third party's bank(s).

Following the Enhanced Diligence, if the third party is assigned a final internal risk rating of 'Low' or 'Medium' it shall be presented to the Chief Compliance Officer for approval to enter into a contractual arrangement with the third party service provider.

In general, barring an omission or manifest error during the initial internal risk assessment, a third party which is assigned an initial internal risk rating of 'High' would be highly unlikely to be assigned a final internal risk rating of 'Low' following Enhanced Diligence.

Savannah will only transact with a third party which is assigned a final internal risk rating of 'High' if approved by the Compliance Committee which, having reviewed the third party contract in conjunction with a risk mitigation plan (as amended from time to time) has concluded that the risk of the third party committing acts of bribery, corruption, money laundering or other economic crimes in connection with their engagement with Savannah is limited and this risk has been appropriately mitigated through contractual warranties or otherwise.

Notwithstanding any such approval being granted, Savannah's delegation of authority policy must be followed before entering into a contractual relationship with the third party.

Contract Terms

All third parties must be engaged by Savannah through a formal written contract. The contract must, at a minimum, address the following elements:

- a) compensation structure;



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- b) any discounts;
- c) the types of services being performed;
- d) whether fees are tied to results (such as Savannah entering into a contract) in the form of commissions or paid on a flat-fee basis;
- e) economic crime provisions appropriate to the risk which the third party presents to Savannah; and
- f) the provision by the third party of anti-corruption certificates at Savannah's request.

Monitoring

Savannah shall monitor the third party's activities after engagement.

The Chief Compliance Officer shall conduct a periodic review in order to ascertain whether Savannah's assessment of the risk which each third party presents to Savannah remains valid.

Reviews and audits may also be conducted as necessary in the discretion of Savannah. When conducting such reviews and audits Savannah may take into account any matters which it deems appropriate, including but not limited to the issues highlighted in this Section.

Acquisitions of Businesses or Teams

When considering the acquisition of businesses, particularly those involving the acquisition of new employees, Savannah shall undertake a due diligence process approved by the Compliance Committee.

Risk Assessment and Anti-Corruption Due Diligence

The main reasons behind the requirement for due diligence are as follows:

- a) to try to establish that third parties in any way acting on Savannah behalf are suitable for this purpose. The intention is to minimise any risk that a third party shall take any actions that could breach any economic crime laws for which ultimately Savannah and its employees could be held responsible.
- b) to try to ensure that the individuals and entities that Savannah does business with are engaged in legitimate businesses. The purpose here is to minimise any risk that Savannah engages with any person or entity engaged in illicit activities; and
- c) to try to ensure that Savannah does not have dealings with a third party that would result in Savannah or its employees falling into disrepute.



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Local Legal Framework

The laws of the jurisdiction in which the third party shall operate could affect the means by which Savannah may engage, utilise and terminate its contractual arrangements with the third party. Savannah shall take appropriate legal advice in such circumstances (if required).