Standard Bank
Offshore Group

Anti-Bribery Policy

Standard Bank Offshore Group Limited ("SBOG"), including Standard Bank Jersey Limited, Standard Bank Isle of Man Limited, Standard Bank Offshore Trust Company Jersey Limited and Standard Bank Trust Company (Mauritius) Limited.

SBOG
- is committed to carrying out business fairly, honestly and openly;
- adopts a zero tolerance approach to bribery and corruption and maintains an anti-bribery and anti-corruption culture;
- requires compliance with all bribery and anti-corruption laws in the countries in which it conducts business (whether through a third party or otherwise);
- recognises that over and above the commission of any crime, any involvement in bribery or corruption will also reflect adversely on its image and reputation;
- will investigate and report any suspicion of bribery or corruption and where necessary provide appropriate assistance to relevant external authorities.

As part of the Standard Bank Group, SBOG is committed to:
- Upholding the Highest Levels of Integrity. Corruption distorts markets and harms economic, social and political development. It is wholly unacceptable for SBOG or any employees, third parties acting on its behalf or any of its clients to be involved or implicated in any way in corrupt practices.
- Avoidance of corrupt acts, including bribery, as these may incur criminal penalties for both SBOG and individuals involved. In particular, in respect of the UK and IOM Bribery Acts the offence of failure by an organisation to prevent bribery from occurring is defensible only on the basis that there are adequate procedures in place to prevent such bribery.

To ensure that SBOG is able to comply with the above commitments and policies we expect that all our clients and their counter-parties observe similar standards. Specifically these will prohibit the offering, promising, giving or soliciting or receiving of a financial or other advantage, either directly or indirectly;

to or from:	any person or company, wherever they are situated and whether they are a public official or body or a private person or company
to or by:	anyone acting on the client's behalf
in order to:	gain or retain an advantage or to bring about an Improper Performance* by another of his functions or to reward such Improper Performance*
or:	where the person acting on the client's behalf knows or believes that the acceptance of the advantage offered, promised or given in itself constitutes Improper Performance*.

Bribes are not restricted to cash payments, but include anything that has a value and is given to influence a decision to do business with another party. Lavish gifts or hospitality such as tickets to sporting events; dinners or overseas travel can all be regarded as bribes. Additionally, benefits may be promised or given indirectly, for example by offering a benefit to a family member or by donating to a political party or a charitable cause linked to a business partner or official.

Bribes may also include Facilitation Payments. For the avoidance of doubt, our Clients are prohibited from making or receiving facilitation payments, otherwise known as "grease payments", (which are usually relatively small payments made to facilitate or expedite routine government action by public officials, to which the payer of the facilitation payment has a legal or other entitlement). Examples include payments to obtain non-discretionary permits, licences, expediting issuance of entry or exit visas or customs clearances.

* Improper Performance means that a person does not act in good faith, impartially or a position of trust in performing an act.

Standard Bank Moving Forward™

Standard Bank Offshore Group Limited

Important Information