

IDEAA GLOBAL Code of Conduct, extensive anti-bribery and corruption program are designed to ensure that we uphold the highest standards of professional integrity and our position is that bribery and corruption are unethical and unacceptable.

In support of this program and position, we have included detailed policies applicable to all personnel, as well as training, compliance procedures.

Our collective commitments, specific to anti-bribery and corruption, include:

- Act lawfully, ethically and in the public interest;
- Not tolerate behavior within IDEAA GLOBAL, by clients or suppliers, or public officials with whom we deal, that is illegal, unethical or breaches human rights;
- Not accept or offer bribes, or participate in corrupt practices, and have a zero tolerance for bribery and corruption in any form by any party; and follow high standards of ethical conduct.

Our policies

IDEAA GLOBAL has policies that all our employees are required to adopt concerning:

- Anti-bribery
- Compliance with laws, regulations and professional standards
- Requirements to report, and consult in relation to, suspected wrongdoing by IDEAA GLOBAL personnel, clients or third parties
- Facilitation payments
- Inducements, including gifts and entertainment
- Political donations
- Charitable donations and sponsorships
- Arrangements with suppliers and other third parties, and internal accounting controls.

Our training

IDEAA GLOBAL provides anti-bribery and corruption training to their people.

The training is required to be completed by client-facing personnel annually, with new hires completing such training within three months of joining. In addition, certain non-client facing personnel who work in finance, procurement, or the sales and marketing departments are also required to participate in anti-bribery training tailored to these groups.

Our compliance programs

IDEAA GLOBAL has monitoring programs that evaluate company's key policies and procedures and the relevance, adequacy and effective operation of key quality control policies and procedures. The results and lessons from the programs are communicated within and the overall findings from these programs are considered.