

U E X O

Beyond Boundaries



ANTI-BRIBERY AND CORRUPTION POLICY

1. INTRODUCTION

UEXO Global Ltd. Has a Global Business Licence and is registered in Mauritius under registration number 179291. UEXO Global Ltd is licensed and authorised by the Mauritius Financial Services Commission (“FSC”) under regulatory licence number GB21026300. The registered office of UEXO Global Ltd is located at 12th Floor, Hennessy Court, Pope Hennessy Street, Port Louis, Mauritius 72201.

UXO Services Ltd. Is registered in Cyprus under registration number HE437025 and has its registered address at Archiepiskopou Makariou III, 84, Office 1, 6017, Larnaca, Cyprus. UXO Services Ltd acts as a group services company providing administrative, operational and technical support to UEXO Global Ltd.

Together referred to as the “Group”.

The Group is committed to conducting its business with integrity, transparency, fairness and in strict compliance with all applicable anti-bribery and anti-corruption laws and regulatory requirements, including but not limited to:

- The Mauritius Prevention of Corruption Act
- The Financial Services Act 2007
- FSC rules and codes
- Applicable international anti-corruption standards
- Any applicable extraterritorial legislation where the Group conducts business

Bribery and corruption undermine trust, distort markets, create regulatory risk and expose the Group to severe financial and reputational damage. The Group maintains zero tolerance for bribery and corrupt practices in any form.

2. PURPOSE

This Policy establishes:

- Clear prohibitions against bribery and corruption
- Governance and oversight mechanisms
- Controls for gifts, hospitality, inducements and third parties
- Escalation and reporting procedures
- Alignment with the Group’s AML, Conflict of Interest and Client Agreement frameworks

3. SCOPE

This Policy applies to:

- Directors
- Senior Management
- Employees
- Contractors and consultants
- Introducers and Affiliates
- Payment Service Providers (PSPs)
- Liquidity Providers
- Technology vendors
- Any third party acting on behalf of the Group
- All individuals and entities subject to this Policy must comply fully and without exception.

4. DEFINITIONS

4.1 Bribery

Offering, promising, giving, requesting or accepting anything of value to improperly influence a decision or secure an advantage.

4.2 Corruption

The abuse of entrusted power for private gain.

4.3 Public Official

Any officer or employee of a government entity, regulator, state-owned enterprise, political party or public international organisation.

4.4 Facilitation Payment

An unofficial payment made to expedite a routine governmental action. Facilitation payments are strictly prohibited.

5. PROHIBITED CONDUCT

The following are strictly prohibited:

- Offering or accepting bribes in any form.
- Providing gifts, hospitality or inducements intended to influence business decisions.
- Kickback arrangements with lbs, affiliates, PSPs or vendors.
- Hidden rebate arrangements tied to trading volume.
- Payments to public officials to secure licensing or regulatory advantage.
- Circumventing onboarding or due diligence procedures in exchange for benefit.
- Manipulating commercial agreements for personal benefit.

- No employee or representative may engage in corrupt conduct directly or indirectly through intermediaries.

6. THIRD-PARTY RISK MANAGEMENT

The Group recognises that corruption risk frequently arises through third parties, particularly:

- Introducing Brokers (Ibs)
- Affiliates
- Marketing agents
- PSPs
- Corporate onboarding intermediaries

6.1 Due Diligence

Prior to engagement, third parties must undergo appropriate risk-based due diligence including:

- Identity verification
- Beneficial ownership screening
- Sanctions and PEP screening
- Adverse media checks
- Regulatory history review
- High-risk counterparties require enhanced due diligence approval by Senior Management.

6.2 Contractual Safeguards

All material third-party agreements must contain:

- Anti-bribery warranties
- Audit rights
- Termination clauses for misconduct
- Compliance with applicable laws

7. GIFTS, HOSPITALITY & INDUCEMENTS

Gifts and hospitality must:

- Be reasonable and proportionate
- Not create a conflict of interest

- Not influence or appear to influence decision-making
- Any gift or hospitality exceeding EUR 200 (or equivalent) must:
- Be declared in writing
- Be approved by Senior Management
- Be recorded in the Gifts Register
- Cash gifts or cash equivalents are strictly prohibited.

8. SALES, MARKETING & INCENTIVE STRUCTURES

All sales commissions, affiliate payments, revenue share arrangements and bonus schemes must:

- Be transparent
- Be documented
- Be aligned with the Client Agreement
- Not encourage misconduct or misrepresentation
- No payment structure may incentivise regulatory breaches, mis-selling or improper client inducement.

9. PROCUREMENT & CONTRACTING CONTROLS

Procurement decisions must be:

- Based on objective commercial criteria
- Properly documented
- Subject to oversight
- No employee may influence procurement decisions for personal benefit.

10. RECORD-KEEPING & FINANCIAL CONTROLS

The Group maintains accurate books and records reflecting all transactions.

Off-book accounts, false invoices, disguised commissions or misclassified expenses are strictly prohibited.

Records related to gifts, third-party payments and commissions must be retained in accordance with regulatory record-keeping requirements.

11. REPORTING & WHISTLEBLOWING

Any suspected bribery or corruption must be reported immediately to:

compliance@uexo.com

Reports may be made confidentially.

The Group strictly prohibits retaliation against any individual who reports in good faith.

12. INVESTIGATION PROCEDURES

Upon receiving an allegation:

- Compliance will conduct a preliminary review.
- Senior Management will be informed where appropriate.
- Independent investigation steps may be initiated.
- External advisors may be engaged if necessary.
- Regulatory notification will be made where legally required.
- Corrective and disciplinary action will follow substantiated breaches.

13. DISCIPLINARY ACTION

Violation of this Policy may result in:

- Internal disciplinary action
- Termination of employment or contract
- Reporting to regulatory authorities
- Civil or criminal proceedings

14. TRAINING & CERTIFICATION

All relevant staff must:

- Receive periodic anti-corruption training
- Acknowledge this Policy annually
- Confirm understanding and compliance

15. GOVERNANCE & OVERSIGHT

Senior Management is responsible for:

- Ensuring effective implementation
- Monitoring compliance
- Periodic review of corruption risks
- Ensuring alignment with AML and Conflict of Interest policies
- This Policy shall be reviewed periodically and updated where necessary to reflect regulatory or operational changes.

16. POLICY INTERACTION

This Policy must be read together with:

- Anti-Money Laundering & CFT Policy
- Conflict of Interest Policy
- Client Agreement
- Complaints Handling Policy
- Code of Conduct