

EGM is committed to the Prevention of Money Laundering Act (Chapter 373 of the Laws of Malta) and related subsidiary legislation. Any person representing the Company globally, whether permanent, temporary, casual, part-time or on fixed term contracts, employees, agency staff, contractors, or consultants are bound by the requirements of Maltese Law. This also applies to third parties and associated persons that perform services on behalf of the Company, including contractors, sub-contractors, agents, intermediaries, introducers, joint ventures and partnerships.

The following acts are strictly prohibited by EGM under its internal Code of Conduct:

- a. **Bribery** – a bribe is to offer, promise or give an advantage (both financial and other benefits) to someone with the intention of inducing that person to behave ‘improperly’ either as a reward for that person behaving in an ‘improper’ manner; or knowing or believing that the recipient’s acceptance of the ‘advantage’ would constitute ‘improper’ behaviour.
- b. **Corruption** – corruption is operationally defined as the ‘misuse of entrusted power for private gain’. Corruption can occur between public officials, business and public officials and business to business corruption. The Company condemns all forms of corruption, and is committed to uphold the well-being, dignity and integrity of the Company itself, its employees and customers. Corruption at work will not be permitted or condoned and employees and customers have a right to complain about it should it occur.
- c. **Gifts** – it is a serious criminal offence for employees to receive or give any gift, loan, fee, reward or advantage for acting or failing to act or for showing favour or disfavour to any person in their capacity.
- d. **Facilitation payments** - the practice of paying a small sum of money to a public official as a way of ensuring that they perform their routine, non-discretionary duties either promptly or not at all.
- e. **Corporate hospitality** – promotional expenditure, gifts and entertainment which are used as a cover for bribery. In order to amount to a bribe, they must be intended to induce a person to perform a function improperly.