

Third-party terms and conditions

# **Anti-bribery and corruption**

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# Anti-bribery and corruption

## 1. Introduction

- 1.1. At Deriv, we hold ourselves to the highest ethical standards. Integrity is at the core of our business operations. We are committed to conducting business with transparency and adhering to all relevant anti-bribery and corruption laws and regulations. We aim to prevent, deter, and detect fraud, bribery, and all other corrupt business practices. This commitment extends to our interactions with third parties, including actual and potential clients, independent contractors, sub-contractors, suppliers, distributors, affiliates, API Users, bug bounty program participants, business contacts or associates, agents, advisers, representatives, and officials.
- 1.2. The Group's policy is to conduct all business activities with honesty and integrity and vigorously enforce its business practices wherever it operates, never engaging in bribery or corruption.
- 1.3. This Third-party anti-bribery and corruption policy outlines our expectations for third parties and their representatives and serves as a framework for preventing bribery and corruption in all business activities involving Deriv.
- 1.4. The Group expects all third parties with which it does business to approach issues of bribery and corruption in a manner consistent with the principles set out herein. In cases where the Group is unable to verify these standards, it will reconsider to suspend or terminate the business relationship.

## 2. Prohibition of bribery and corruption

- 2.1. The Group strictly prohibits anyone acting on its behalf, directly or indirectly, from making or receiving a bribe and making corrupt payments in all circumstances, whether in dealings with government and public officials or individuals and entities in the private sector.

## 3. Gifts, entertainment, and hospitality

- 3.1. We recognise that bribes may be anything of value and not just money — gifts, inside information, favours, corporate hospitality or entertainment, offering employment to close associates, payment or reimbursement of travel expenses, and charitable donations, which can be given directly or through a third party.
- 3.2. We will not offer or accept gifts that could affect either side's impartiality, influence a business decision or lead to the improper performance of an official duty. Third parties, in turn, must not offer or accept gifts, entertainment, or hospitality that could influence or be perceived as influencing a business decision.

## 4. Due diligence and risk assessment

- 4.1. Deriv adopts a stringent risk-based approach in assessing its Third-Party business relationships. This includes an assessment of their integrity, reputation, and compliance with anti-bribery and corruption laws. Deriv monitors the conduct of Third Parties to detect and prevent potential bribery and corruption risks. This may include periodic audits and assessments.

## 5. Compliance with laws and regulations

- 5.1. Deriv requires third parties with whom it conducts business to adhere to all applicable anti-bribery and corruption laws, both local and international, as well as all other relevant and applicable legislation in their jurisdiction.

## 6. Reporting and whistleblower protection

- 6.1. The Group operates a whistleblowing system with a dedicated reporting system via [speakup@deriv.com](mailto:speakup@deriv.com). Third parties are encouraged to report any concerns or violations of this policy or any actual or suspected corrupt practices involving Deriv to the Director of Deriv Group & Head of Compliance, Ms Joanna Frendo, via [joanna@deriv.com](mailto:joanna@deriv.com) or [speakup@deriv.com](mailto:speakup@deriv.com).
- 6.2. The Group does not tolerate retaliation against anyone who reports an issue with a reasonably held belief that wrongdoing has occurred.
- 6.3. The Group shall investigate all credible reports, treat them seriously, and take appropriate actions. All investigations shall be carried out confidentially by the Compliance Function.

## 7. Contact information

- 7.1. For questions or concerns related to this policy, please reach out to us at [compliance@deriv.com](mailto:compliance@deriv.com).

## 8. Acknowledgement of this policy

- 8.1. Third parties who work for or with Deriv and are subject to this Policy agree to:
- 8.1.1. Adhere to the requirements set out in this Policy.
  - 8.1.2. Provide complete and accurate information to facilitate Third-Party due diligence efforts undertaken by Deriv.
  - 8.1.3. Comply with applicable laws and regulations in the country or countries where they operate.

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