

# **Anti-bribery and corruption policy for partners**

# Table of contents

1. Introduction	3
2. Scope and prohibited activities	3
3. Undisclosed conflicts of interest	3
4. Partners' responsibilities	4
5. Reporting concerns and non-retaliation	5
6. Due diligence and ongoing monitoring	5
7. Consequences of policy breach	5
8. Policy review	5

# Anti-bribery and corruption policy for partners

## 1. Introduction

Deriv is committed to conducting all its business activities with the highest standards of integrity, transparency, and ethical conduct. We have a zero-tolerance approach to bribery and corruption. This anti-bribery and corruption policy for partners (“**ABC Policy**”) is a fundamental component of our commitment to upholding these values and complying with all applicable anti-bribery and corruption laws.

This ABC Policy applies to all partners (including partners on Turnover and Revenue Share plans, payment agents, and Deriv API users working globally), hereinafter referred to as “**Partners**”.

All Partners agree to adhere to the principles set out in this ABC Policy and to conduct their business in a manner that prevents and detects bribery and corruption in all its forms.

## 2. Scope and prohibited activities

This ABC Policy prohibits all forms of bribery and corruption, directly or indirectly, involving any Partner. Prohibited activities include:

### 2.1. Bribery

Offering, promising, giving, or authorising the giving of any financial or other advantage (including gifts, entertainment, or other benefits) to a government official or private individual or entity with the intent to induce or reward them for improper performance, or to obtain or retain business or any improper advantage.

### 2.2. Corruption

The misuse of entrusted power for private gain. This includes, but is not limited to, embezzlement, fraud, extortion, and abuse of influence.

### 2.3. Kickbacks

The payment or receipt of any money, fee, commission, credit, gift, gratuity, thing of value, or compensation of any kind for the purpose of improperly obtaining or rewarding favourable treatment in a business transaction. This explicitly includes undeclared payments or benefits made in return for business referrals or contract awards.

## 2.4. Facilitation payments

Small, unofficial payments made to secure or expedite a routine or necessary government action. All such payments, regardless of amount or local custom, are strictly prohibited.

## 3. Undisclosed conflicts of interest

Any situation where a Partner's private interests or those of its personnel could improperly influence their actions or decisions in their dealings with Deriv. Partners must disclose any actual or potential conflicts of interest immediately.

### 3.1. Gifts, hospitality, and expenses

While legitimate and reasonable gifts, hospitality, and expenses are a part of business, they must never be offered, given, or received with the intent or appearance of influencing a business decision or gaining an improper advantage. All such offerings must be:

- Lawful, ethical, and transparent.
- Modest in value and frequency, and not lavish.
- Made openly, not secretly.
- Not cash or cash equivalents.
- Consistent with local customs and never used to circumvent the intent of this ABC Policy.

## 4. Partners' responsibilities

All Partners are responsible for:

- Adherence to policy: Reading, understanding, and strictly adhering to this ABC Policy and any related procedures issued by Deriv.
- Legal compliance: Complying with all applicable anti-bribery and corruption laws and regulations in all jurisdictions where they conduct business.
- Due diligence on sub-third parties: Conducting appropriate due diligence on any sub-agents, sub-contractors, or other third parties they engage to perform services for or on their behalf, and ensuring that such parties also comply with the principles of this ABC Policy.
- Accurate books and records: Maintaining accurate, complete, and transparent books, records, and accounts that truthfully reflect all transactions and dispositions of assets in connection with their activities related to Deriv. No undisclosed or unrecorded funds or assets shall be established or maintained for the purpose of facilitating or concealing illicit payments.
- Training and awareness: Ensuring that any other person acting on their behalf receives adequate training and is aware of their obligations under this ABC Policy and relevant anti-bribery laws.
- Cooperation with audits: Cooperating fully with any reasonable requests from Deriv for information, documentation, or audits to verify compliance with this ABC Policy.

## 5. Reporting concerns and non-retaliation

Deriv relies on its Partners to help uphold its ethical standards. Partners are encouraged and expected to report any actual or suspected violations of this ABC Policy, or any concerns related to bribery or corruption, without fear of retaliation.

For further guidance, please refer to the Whistleblowing Policy for Partners.

Concerns should be reported promptly to: [speakup.partners@deriv.com](mailto:speakup.partners@deriv.com)

## 6. Due diligence and ongoing monitoring

Deriv undertakes appropriate due diligence on all Partners before engagement and periodically throughout the relationship. This process may include background checks, integrity assessments, and risk evaluations. Partners are expected to provide all necessary information and cooperation during this due diligence process. Deriv reserves the right to terminate any relationship where a Partner fails to meet their due diligence requirements or raises significant bribery and corruption risks.

## 7. Consequences of policy breach

Any Partner found to be in breach of this ABC Policy will face severe consequences, which may include, but are not limited to:

- Immediate termination of all contracts and business relationships with Deriv.
- Forfeiture of any payments or benefits due from Deriv.
- Potential legal action and pursuit of damages by Deriv.
- Reporting to relevant authorities where required by law.
- Reputational damage and potential disqualification from future engagements with Deriv.

## 8. Policy review

This Policy will be reviewed annually. More frequent reviews may be conducted as needed, particularly in response to changes in legislation, operational processes, or the organisational structure of the Deriv Group.

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