



**CABLE BAHAMAS LTD.
(CBL Group/CBL)**

**ANTI-CORRUPTION AND BRIBERY POLICY
MAY 2022**

**Our Code of Conduct and the way we work
requires that:**

- **We don't tolerate bribery of any kind.**
- **We never offer or accept gifts, payments or hospitality to encourage or reward a decision.**

Scope

This policy applies to all employees in the CBL Group and to all those acting on the Group's behalf. All third parties doing business with the CBL Group or acting on our behalf must follow this policy and put in place procedures to prevent and detect bribery and corruption.

Objective

The CBL Group has zero tolerance of bribery and corruption. The CBL Group as well as others acting on our behalf must understand and comply with our zero-tolerance approach to bribery and corruption in every place and location in which the CBL Group operates.

Consistent with our zero-tolerance policy for bribery and corruption in our business we will in this document ensure that our employees are made aware of the circumstances in which bribery and corruption can present in their job functions and what to do about it.

What is Bribery and Corruption?

- If you make, authorize, seek or accept any kind of offer, gift, kickback, illicit payment or facilitation payment to get or keep an unfair advantage, that's bribery. It doesn't have to involve money.
- If you offer, promise or give something intending to influence someone's behaviour or actions, this is bribery. It is also bribery if you do it indirectly via any third party such as consultants, contractors, agents, sponsors or joint venture partners, advisors, customers, or suppliers.
- If you use CBL's funds for any unlawful, improper or unethical purpose.
- You must take care when you are dealing with government or public officials as laws are strict and your actions could be misinterpreted. We must never offer, promise or give anything of value with the aim of influencing any government or public official in their work. This includes facilitation payments or "grease payments" such as payments to speed up the performance of routine governmental actions. **Properly invoiced payments to the Public Treasury for services rendered may be paid.**
- You must not offer or if you are offered a bribe which isn't accepted or if you promise or are promised something which is never delivered, this is also unacceptable.

Gifts **Tips** and Hospitality

- Don't offer or accept gifts, payment or hospitality (e.g., lunch or dinner) to encourage or reward a decision.
- **As a general rule you can accept a meal, gift or entertainment from non-government customers, suppliers or business partners if it is unsolicited, reasonable and not given to influence business decisions or your judgment. The prior approval from the CBL President & CEO, The Aliv CEO, the Group CFO and the VP HR must be obtained in order to accept a meal, gift or entertainment. Remember transparency is key.**
- **With the prior approval of the CBL President & CEO, The Aliv CEO, the Group CFO and the VP HR, you may provide reasonable meals, gifts or entertainment to non-government**

customers, suppliers or business partners provided that these are unsolicited, related to proper business purposes and not offered to influence a business decision and are permissible under applicable laws.

- Cash or cash equivalents are not acceptable forms of gifts in any circumstance.
- Do not accept tips or gratuities from customers as a reward for services rendered. When tips are offered, these should be graciously declined.
- Do not take any action prohibited hereunder through any third-party.

Political Contributions

- You are not permitted to make political contributions on behalf of CBL or any company in the CBL Group. You are able to make personal contributions or participate in political activities, at your own expense and in your own time. When you engage in these activities, you should ensure that it is clear that you are not representing CBL or the CBL Group and are doing so in your personal capacity.

Charitable Donations and Sponsorship

- You must not use charitable donations or sponsorship as a way of concealing a bribe. All charitable or community donations and sponsorships by the CBL Group must be appropriately approved and be transparent.

Keeping Records

- Our record keeping must be accurate and transparent. If you are responsible for keeping records make sure that they accurately reflect and are a fair presentation of the activities they record and reflect the nature and purpose of the activity. This includes records relating to gifts and hospitality, charitable and political contributions, pre-approval documents and checks of third parties.

Responsibility of Each Employee

- As a CBL Group employee or someone acting on CBL's behalf, you are expected to conduct company business following the highest professional and ethical standards and in line with the applicable country laws under which CBL does business.
- We are all individually responsible for reading, knowing and complying with this policy and our Code of Conduct and the way we work. If you are a manager then it is your responsibility to make sure that each member of your team has access to the guidance and completes the training they need so that they understand and follow this policy.
- Breaches of this policy can result in CBL taking disciplinary action and could lead to dismissal in serious cases. Bribery is also subject to laws and controls worldwide and there are serious penalties in some countries for anyone, or any company, breaking these laws including unlimited fines and imprisonment.

Procedures

Bribery and Corruption

- Don't make payments in cash, bonds, securities or anything similar. Always make payments by wire transfer or cheque to a bank account which is in the name of the person or their representative and which is in the country where they regularly provide services to the Cable Group.
- If you are appointing a third party to work for the Cable Group, follow the correct process. Procurement is responsible for appointing suppliers.

How to Report Incidents of Bribery and Corruption

- If you are approached and asked to pay a bribe, including facilitation payments, or are offered a bribe, or you think another Cable Group person or third party may be offering or offered a bribe or be involved in any corrupt behaviour, then report or discuss this with your manager and notify CBL Group Whistleblower hotline at 888-528-0638.
- There may be some instances where you want to raise a sensitive ethical issue with someone who isn't connected to your team. We advise you to speak confidentially with the executive responsible for your area or contact the Legal Department at 805-1749.
- We know it takes courage to speak up. We'll do whatever we can to support and protect you and we won't permit anyone to retaliate against you for reporting your concerns. If someone tries to deter you from speaking up, that is a disciplinary offense, and it will be handled in a

very serious manner.

Guidance

Potential Cases of Bribery and Corruption

Take particular care if there are any of these 'red flags' and ask for guidance from the Legal team at legal@cablebahamas.com:

- Any close family, personal or business ties that a third party or partner has with government officials.
- A history of corruption in the country or business sector in which the CBL Group intends to do business.
- A request for a cash payment.
- Requests for commissions substantially above the normal rate.
- Unusual payment arrangement such as payments to be made in a third country or to a third party.
- Requests for us to pay expenses which are unusual or vague.
- Invoices which are too high or non-standard.
- Where a third party refuses to agree to take action where a payment is corrupt.

A request for a facilitation payment or the payment of a bribe under duress (blackmail and extortion) should be reported immediately to your department's executive and the Legal Department.

CBL Group Related Policies

- Conflicts of Interest Policy

Policy Owner

The Nominating & Corporate Governance Committee of the Cable Bahamas Board of Directors

MAY 2022