

Global Trade Finance Societas Europaea

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Republic of Austria

European Union

Anti-Corruption Policy

Adopted by Global Trade Finance Societas Europaea (GTFSE)

Preamble:

Global Trade Finance Societas Europaea (GTFSE), being a responsible financial entity governed by the laws of the Republic of Austria and the European Union, adopts this Anti-Corruption Policy in alignment with national legal standards, including the framework and guidance provided by the Austrian Federal Bureau of Anti-Corruption (BAK), and in accordance with international legal instruments.

Article I – Definitions

- “Corruption” means the abuse of entrusted power for private gain, consistent with definitions under Austrian criminal law and the BAK framework.
- “Bribery” includes both active and passive bribery under Sections 304–309 of the Austrian Criminal Code.
- “Facilitation Payment” refers to unofficial payments intended to expedite routine procedures, which are prohibited by Austrian law.
- “Conflict of Interest” denotes any situation where private interests may improperly influence professional decisions.

Article II – Policy Declaration

GTFSE affirms its zero-tolerance policy on corruption. This Policy integrates the standards of UNCAC, OECD Anti-Bribery Convention, FCPA, UK Bribery Act, Sapin II, Brazil’s Clean Companies Act, the UNGPs, and the Austrian Federal Bureau of Anti-Corruption (BAK) guidelines.

Article III – Applicability

This Policy applies to all directors, officers, employees, contractors, agents, and representatives of GTFSE.

Article IV – Prohibited Practices

- Offering or receiving bribes or other undue advantages.
- Making facilitation payments or unofficial fees.
- Engaging in bid-rigging or procurement collusion.
- Exerting undue influence over public or private decisions.
- Maintaining off-the-book accounts or falsified records.

Article V – Legal Compliance

GTFSE adheres to all applicable Austrian laws on corruption, including the Austrian Criminal Code and guidance issued by the BAK.

Article VI – Risk-Based Due Diligence

- Evaluating third parties through structured due diligence aligned with BAK risk indicators.
- Identifying high-risk engagements including public procurement and politically exposed persons (PEPs).
- Documenting and monitoring all relationships with intermediaries and agents.

Article VII – Training and Awareness

All personnel shall undergo annual anti-corruption training that reflects Austrian legal obligations and the BAK's preventative approach.

Article VIII – Record-Keeping and Transparency

All financial transactions must be accurately documented. GTFSE prohibits off-the-record accounts, in line with BAK compliance practices.

Article IX – Reporting and Whistleblower Protection

- GTFSE maintains internal and anonymous channels for reporting suspected violations.
- No retaliation will be tolerated against whistleblowers acting in good faith.
- Reports may also be submitted directly to the BAK in accordance with Austrian law.

Article X – Monitoring and Enforcement

Breaches of this Policy shall be investigated and may lead to disciplinary actions, contract termination, or legal referral as recommended by the BAK framework.

Article XI – EU-Level Anti-Corruption Enforcement Bodies

- GTFSE recognizes the role of the European Public Prosecutor's Office (EPPO) in investigating and prosecuting criminal offenses affecting the financial interests of the European Union, including corruption involving EU funds or cross-border fraud.
- GTFSE acknowledges the competence of the European Anti-Fraud Office (OLAF) to conduct independent administrative investigations into fraud, corruption, and other serious misconduct within EU institutions or involving EU expenditure.

- GTFSE adheres to the evolving regulations of the Anti-Money Laundering Authority (AMLA), particularly in its supervisory role over high-risk entities and cross-border financial activity, to ensure no laundering of proceeds from corrupt acts occurs.
- This Policy upholds the European legal standard defining corruption as 'the misuse or abuse of entrusted power or authority for private gain,' consistent with EPPO, OLAF, and AMLA interpretations and operational mandates.
- GTFSE commits to cooperating fully with EU-level investigations and ensuring compliance with preventive frameworks set by the aforementioned bodies.

Article XII – Anti-Corruption Officer

GTFSE shall appoint a designated Anti-Corruption Officer (ACO) who shall serve as the central authority for the development, implementation, and oversight of this Anti-Corruption Policy.

The ACO shall report directly to the Board of Directors and act independently of all business operations to ensure impartiality in monitoring and investigations.

The responsibilities of the ACO shall include:

- — Conducting internal audits and risk assessments related to corruption risks.
- — Reviewing and updating the Anti-Corruption Policy regularly.
- — Organizing and overseeing staff training and awareness programs.
- — Serving as the primary point of contact for internal reporting and external cooperation with national and EU authorities including the BAK, EPPO, OLAF, and AMLA.
- — Ensuring timely and thorough investigations of all reported corruption-related matters and advising on disciplinary measures or remedial actions.

Article XIII – Scope of Applicability Across Affiliated Entities

This Anti-Corruption Policy shall apply not only to Global Trade Finance Societas Europaea (GTFSE) but also to all subsidiaries, affiliates, joint ventures, and any other entities in which GTFSE holds an equity interest, exercises control, or maintains a governance role, whether direct or indirect.

GTFSE shall make reasonable efforts to ensure that such entities adopt equivalent anti-corruption standards and cooperate fully with the implementation of this Policy.

Where GTFSE does not have controlling interest, it shall use its influence to encourage alignment with the principles and practices outlined herein.

This extension of applicability is consistent with best practices under UNCAC, OECD guidelines, and EU compliance frameworks.