



PwC's Policy on Corruption and Bribery - Third Parties



PwC has a zero tolerance policy towards bribery and corruption and Third Parties must never engage in such practices.

Corruption is more inclusive than bribery. It may include improper conduct, the abuse of entrusted power for private gain and providing someone an improper advantage, regardless of whether that rises to the level of bribery or not.

A bribe is the offering, promising, giving, accepting or soliciting of money, a gift^[2] or other advantage as an inducement or reward for doing something that is illegal, unethical, improper or a breach of trust.

A bribe is not only payment or receipt of cash. A bribe can be anything of value and can take many other forms, including:

- Consultancy fees and commissions to parties not actually performing services;
- Payments in-kind including any non-cash items of value such as travel, hospitality, entertainment, employment opportunities, and gifts^[2];
- Employment of family members of government officials outside the normal hiring process; and Sponsorships/donations.

All Third Parties and their staff, directors, partners, sub-contractors, agents, engaged in relation to any matter on behalf of PwC should be aware of and abide by all relevant local (and global , where applicable) anti bribery and corruption laws and our policy guidance detailed below.

During the period of our business relationship, Third Parties, will at all times:

- (1) Not solicit, accept, offer, promise or pay a bribe or improper payment, either directly or through a third party including the giving / receiving of preferential treatment that may be perceived as a bribe, in particular, but not limited to / from government officials (including employees of state-owned entities) or their relatives. This includes so called "facilitating payments" or "facilitation payments"^[1]
- (2) Not accept or receive anything of significant value from a private commercial customer or partner that may compromise, or is likely to be perceived to compromise, your integrity or objectivity.
- (3) Not enter into any arrangements with organisations or competitors, formally or informally, to unlawfully restrict competition, set prices, or allocate clients, markets, people, or services
- (4) Not provide any service, or enter into any business relationship, that could constitute you or your firm being involved in direct or indirect money laundering activities and ensure you know the identity of customers and others with whom you do business, and adhering to applicable standards on anti-money laundering.
- (5) Not conduct any activities in breach of applicable economic sanctions or undertake services which assist customers or clients in breaching applicable sanctions laws.
- (6) Identify and report to PwC any actual or potential conflicts of interests that may impair or appear to impair your or PwC's objectivity and independence.

- (7) Identify and evaluate bribery and corruption risks including in relation to all third parties you work with and manage those risks as well as require equivalent standards to those set out in this document from any third party to whom you are permitted to subcontract any PwC work.
- (8) Timely report to us all suspected instances of bribery or corruption matters relevant to our business relationship. When in doubt, you will seek guidance from your PwC Representative or contact.

Failure to report a related issue or breach of this Policy will constitute grounds for termination by PwC of this agreement and any other agreement between the Provider and PwC.

[1] **Facilitating payments** - Facilitating / facilitation payments (also known as "speed payments" or "grease payments") are payments of small monetary value provided (in cash or kind) to government officials to encourage them or influence them to perform - or speed up the performance of - routine, non-discretionary functions that they are otherwise obligated to perform (such as speeding the issuance of a license, visa, or permit for which the applicant has met all requirements and is entitled to by law).

Facilitating / facilitation payments do not include legitimate administrative fees and legitimate payments for fast track services that are paid to an organisation (not to an individual) and where a receipt may be issued on request (such as paying an expediting fee to speed issuance of a travel visa where the expediting fee is published on the immigration department's website).

[2] **Gift limits** – For PwC the value limit for sending or receiving gifts is €100 (including VAT) or less.



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