



KÖBO
The Chain People

KOBO (UK) Ltd

Commercial Bribery and No Improper Payments to Government Officials

We should not solicit, give, or receive commercial bribes or unlawful kickbacks. We should also be careful to avoid even the appearance of such improper conduct.

“Commercial bribery” generally includes any situation where a Köbo (UK) Ltd employee or someone acting on Köbo (UK) Ltd.’s behalf offers or gives something of value with the intent to improperly influence a business action or decision.

Unlawful “kickbacks” generally include any situation where an employee receives an improper personal benefit in exchange for taking or refraining from taking an action on behalf of Köbo (UK) Ltd. Köbo (UK) Ltd will not tolerate commercial bribery or unlawful kickbacks, whether it is done directly or through a third party.

In addition to avoiding commercial bribery and unlawful kickbacks, we comply with all applicable anticorruption laws regarding improper payments to government officials. “Improper payments” include both direct and indirect payments, or an offer, promise or authorization of a payment or anything of value to a government official for purposes of improperly influencing government acts or decisions in order to obtain or retain business or otherwise secure a business advantage.

Note: that improper payments can take the form of cash, gifts, or lavish entertainment. “Government officials” include officials of government entities, international organizations and political parties, employees of state-owned companies, and even employees of government owned or controlled companies and joint venture partners.

Köbo (UK) Ltd prohibits improper payments to government officials. It is important to remember that engaging in bribery, or even appearing to engage in such activity, can expose you and our Company to criminal liability. Never retain a third party to make an improper payment to a government official or enter into any transaction where you suspect a third party is making such payments. Doing so violates our Code and anticorruption laws.

We must carefully screen all third parties using our due diligence procedures before retaining them.