



Olam Agri

Anti-Bribery & Corruption Policy



Anti-Bribery & Corruption Policy

Olam Global Agri Pte. Ltd. and its subsidiaries (Olam Agri or the Company) uphold all applicable laws globally relevant to countering bribery and corruption. It's the Company's policy to conduct all its business in an honest and ethical manner.

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Our Policy Statement

This Policy applies to all employees, officers, and directors of the Company (whether permanent or temporary) and to our subsidiaries, affiliates, and related corporations, whether they're permanent or temporary (Company employees).

We take a zero-tolerance approach to bribery and corruption and require all our Company Employees (defined below) and Associated Persons (defined below) to act professionally, fairly and with integrity in all their business dealings and relationships wherever they operate.

We uphold all applicable laws globally, including the (Singapore) Prevention of Corruption Act (SPCA), as well as the local anti-bribery and corruption laws in the countries where we conduct business. Consistent with our commitment, Olam Agri has introduced this globally applicable Anti-Bribery and Corruption Policy

This Policy is intended to reflect our commitment to uphold all applicable laws globally and conduct all our business in an honest and ethical manner.

It incorporates all the SPCA requirements, and all the obligations we set out here apply to all our activities globally.

Giving or receiving of bribes in any form, for any corrupt purpose is an offence under the SPCA, Chapter 241 (Singapore), regardless of who enjoys the benefit or effect of the bribe. The bribery offence can be established even if the relevant person wasn't able to complete or act upon their corrupt intention.

The UK Bribery Act 2010 (UK BA) and US Foreign Corrupt Practices Act 1977 (FCPA) will also apply to all activities, entities and persons with a UK or US -nexus as set out in Appendix 2. If either your activities or your entity relates to – or if you're covered by either or both regimes – it's essential that you comply with all additional obligations (i.e. of BA and FCPA), which are also set out in Appendix 2.

Application

This Policy applies to all employees, officers, and directors of the Company (whether permanent or temporary) and to our subsidiaries, affiliates, and related corporations, whether they're permanent or temporary (Company employees).

In addition to Company Employees, employees, officers and directors of the Company's representatives, vendors, contractors, shippers, agents, customers, suppliers, consultants, business contacts, advisers, brokers – including authorised travel agents and general sales agents, and any other entity that performs services for or on behalf of the Company or any of its subsidiaries or their employees, wherever located (collectively, Associated Persons, are expected to have and comply with their own ethical business policies or comply with this Policy.

Where we enter a joint venture (JV) of any kind, we expect that all JV entities to implement an equivalent policy with similar underlying principles of ethical business to this one.

This Policy makes it mandatory that Company Employees and Associated Persons avoid engaging in any bribery or corrupt practices.

It's intended to help you conduct your business legally, ethically and with integrity. It isn't meant to stop any legitimate business activities, as long as those activities comply with applicable law and with our internal policies on conducting ethical business. activities comply with applicable law and with our internal policies on conducting ethical business.

This Policy

- **Sets out employee responsibilities** for detecting and preventing bribery in all its forms, and for observing and upholding our position against any bribery and corruption.
- **Provides information and guidance** on how to recognise and deal with bribery and corruption issues, and any behaviour that isn't generally acceptable to Olam Agri.
- **Signposts to further support** if you're in any doubt about whether any specific conduct could amount to bribery or corruption. You should contact the Legal function immediately and discuss this with your supervisor.

Breach of this Policy

- Any breach of this Policy could result in disciplinary action including, but not limited to, dismissal of the employee or termination of the relationship with Associated Persons. Olam Agri can amend this Policy at any time at its own discretion.

Note: This Policy applies even in circumstances and in countries where the giving and receiving of bribes or such corrupt payments may be common local practice or custom. It's not a valid defence against a charge of corruption to show that the bribe in question is customary in any profession, trade, vocation or calling, industry, jurisdiction, or country.

What is Bribery?

Bribery includes gaining any unfair advantage directly or indirectly. This could be through promising; offering; agreeing to pay; authorising payments; paying for; giving; accepting; and/or soliciting anything of value (financial or otherwise) to or from a third-party (including but not limited to a public official) to secure or reward an improper benefit or service and/or performance of a function or activity.

Bribery doesn't have to involve cash, or even an actual payment exchanging hands. Equally it could be an expensive gift, lavish treatment during a business trip, or tickets to a hospitality event.

This applies whether you're being asked for anything of value or whether any offer is instigated by you to the potential recipient, directly or indirectly through a third-party.

Prohibited payments or offers don't change regardless of circumstance, whether they're given to a government official or an employee of a non-governmental business or entity.

Things of value that could be deemed a prohibited payment include bribes, kickbacks, a financial advantage, or any other benefit, whether in cash or in kind, tangible or intangible.

Examples include money, gifts, meals, entertainment, airline tickets or discounts, travel vouchers, offers of employment and/or charitable contributions.

Prohibited payments also include so-called 'facilitation payments' which are routine payments typically made to low-level government officials to expedite or secure a service or routine action. You'll find examples of facilitation payments in Appendix 2.

Key Responsibilities

All Company Employees are required to comply with this Policy. Every employee is responsible for the prevention, detection and reporting of bribery and other forms of corruption that could impact our business. All Associated Persons are expected to have and comply with their own ethical business policies or comply with this Policy.

All Company Employees and Associated Persons must comply with the following requirements.

- Read, understand, and comply with this Policy and be vigilant in applying it.
- Ensure all Associated Persons are aware of this Policy.
- Complete all mandatory anti-bribery and corruption training as provided, or requested, by Olam Agri from time to time.
- Report any known or suspected bribery or corruption. Notify our Legal function, your supervisor, or our anonymous [Olam Agri Fraud Line](#) if you believe or suspect that there's been or is likely to be a conflict with this Policy.
- Whenever you're starting business with a company you haven't dealt with before, you're obliged to complete Olam Agri Counter party Information Screening Form and send to your BU screening 'Requester' or to the Sanctions Screening Desk (SSD)¹.

Requestors/SSD are staff who normally set up new counter parties in a payment or trade system such as SAP, JDE, OPS. The Requestor/SSD will then carry out the appropriate due diligence on third-parties before sanctioning any contract, transaction, or relationship.

In certain cases, you'll need to be extra vigilant when applying due diligence. This might apply when you're:

- Transacting with a new client based in a higher-risk jurisdiction.
- Undertaking an activity that may be high-risk in nature.
- Entering a joint venture.
- Considering using a third-party agent.
- Ensure Olam Agri's standard anti-bribery and corruption legal clauses are incorporated into any contracts you enter with a counter party.

All contracts – particularly those involving agents or consultants acting on behalf of the Company – should include anti-bribery and corruption protection. It's important that you don't agree any anti-bribery or corruption clauses from a counter party without consultation with our Legal function.

- Be alert for any suppliers with poor reputation or practices. We strongly recommended that you don't work with a counter party which doesn't have its own policy on ethical business practices.
- Be alert to close relationships between parties in the supply chain (e.g. agent/distributor) or with government officials.
- Seek a detailed breakdown of all fees/costs upfront, especially where success fees and services are concerned, and question anything which appears unusual.

Olam Agri's Board of Directors, Executives and senior management have ultimate responsibility for ensuring that our Policy complies with Olam Agri's legal and ethical obligations. They're also responsible for ensuring that all Company Employees are aware of and comply through regularly scheduled mandatory training and appropriate systems and controls.

- Must ensure that accurate records of all documentation linked to the giving or receiving of gifts and hospitality are accurately maintained in the Gifts and Entertainments (G&E) Register and are also periodically reviewed by Internal Audit.

Our Human Resources function has responsibility for notifying new employees about this Policy at their induction, and for contacting the Legal function to ensure they receive appropriate training.

Our Legal function is primarily responsible for implementing this Policy and dealing with any queries you might have.

Internal Audit is responsible for monitoring business compliance with this Policy during their routine business audits.

¹ A list of the most commonly imposed sanctions regimes applicable to Olam Agri can be shared on request by emailing the Legal team via sanctions@olamagri.com.

Gifts & Entertainment

Gifts and/or entertainment mean anything with commercial or personal value, including, for example: transfer of value such as discounts, loans, sponsorship; favourable terms on any product or service, transportation; use of the Company or other's assets; subsidising of expenses, tickets to a sporting or theatrical event; client entertainment, dinner, or drinks.

- 1 The giving of gifts or entertainment is a routine part of doing business and can help to promote our brand. However, please exercise extreme caution to ensure that giving of any gifts or provision of hospitality doesn't create a conflict of interest. Accepting or giving a gift or hospitality in return for a business advantage or a competitive insight, whether directly or indirectly, knowingly, or unknowingly, isn't permitted.
- 2 Consistent with Olam Agri's Code of Conduct, the giving of appropriate gifts and hospitality that don't create a conflict of interest for any of the participants are acceptable.
- 3 Subject to sub-clauses 3 and 6 in this section, any gifts and/or hospitality:
 - Should be less than a market value of two hundred and fifty US dollars (US \$250) per person/per event.
 - Mustn't fall into the 'Prohibited' category set out below.
 - Examples of what's allowed include customary token gifts and hospitality during festive seasons, such as 'thank you' gifts for event speakers giving their time free of charge, or promotional items of low value such as pens, calendars, etc.
- 4 Keeping a detailed record on all high-value Gifts (given or received) and Entertainment (provided) is essential, and it's one of the most efficient ways that together we can detect and prevent any instances of bribery and corruption.

All Company Employees must promptly record details of any customer, agent, consultant, or third-party advisor who've given or received a gift or entertainment in excess of US \$250 in the Gifts and Entertainments Register, explaining why these high-value items have been accepted. This doesn't replace our usual process for claiming expenses.

Note: If you're proposing to provide a gift or entertainment/hospitality to a Government Official (as defined in the Olam Agri Policy Policy for Dealing with Governments and Government Officials) you must get approval before providing such gift or entertainment/hospitality. This can be done in three different ways:

- Complete the online Gift and Entertainments Register on the EBP-Anti-Bribery and Corruption Workplace page.
- If you've claimed for gifts and entertainments to be paid via SAP, you'll receive an email requesting that you complete the Gifts and Entertainments Register with the link you need.
- If you're unable to do either of the above, manually complete the Gifts and Entertainments Form and send a copy to your supervisor and the local financial controller for your origin. Managers must ensure their staff have completed the Gifts and Entertainment Form when they approve their expenses for high value gifts and/or entertainment.

5 Notwithstanding sub-clause, Olam Agri is a member of the Chicago Board of Trade (CBOT). CBOT Rule 508 states that a member and its employees can't give any employee of another member, member firm or broker association any gratuities or gifts with an aggregate market value more than US \$100 within any twelve-month period. Any employee dealing with CBOT members must stay within this financial limit.

6 To ensure that your intentions can't be misconstrued either by the recipient or by other third-parties for example, don't give a gift or provide entertainment when a transaction, contract or tender is underway, or even after it's completed.

7 This Policy doesn't forbid provision or receipt of normal/appropriate gifts and/or entertainment to or from third-parties if you meet the following requirements:

- It's not intended to influence a third-party to obtain or retain business or a business advantage, or to reward provision or retention of any business advantage, or in explicit or implicit exchange for favours or benefit.
- It complies with applicable law, including any local requirements.
- It's given in Olam Agri's name, not in yours.
- It doesn't include cash or a cash equivalent (such as gift certificates or vouchers).
- It's appropriate in the circumstances, for example, in Europe and the US, it's customary for small gifts to be given at Christmas.
- Considering the reason for the gift, it's an appropriate type and value and given at an appropriate time.
- It's given/received openly, not secretly.
- It doesn't jeopardise Olam Agri's reputation or interests, our employees, or customers.

8 If any of our employees receive any Gifts or Entertainment or other benefit deemed forbidden, please return it immediately and don't accept the hospitality.

If returning the Gift is impractical or undesirable, then please hand it over to the country/product management for donation or disposal as appropriate, and keep a record for future proof, in case it's needed.

Please send written communication accompanying any returned Gifts or rejected Entertainment to the donor explaining Olam Agri's policy with respect to gifts and hospitality and requesting that no such donations are made in the future.

Please always consider the intention behind the gift or entertainment/hospitality offered/given to ensure it's acceptable. If you're in any doubt, our Legal function can advise you whether it they consider it acceptable.



Donations

We only make charitable donations that are legal and ethical under local laws and practices. Please don't offer or make any donation without the prior approval of the Legal function.

Any contribution made to Governments or Government Officials must be in line with our Policy for Dealing with Governments and Government Officials.

Company Employees and Associated Persons should be alert to the fact that giving or offering charitable donations or charitable sponsorship with the intention of inducing or rewarding improper conduct in relation to Olam Agri's business is likely to constitute a bribe and is strictly prohibited.

Record Keeping

We're required to keep financial records and we've got the appropriate internal controls in place to evidence our business reasons for making any payments to third-parties.

Ensure that you submit all expenses claims relating to gifts, hospitality and entertainment, or expenses incurred to or by third-parties, in accordance with the Company's expenses policy and that you specifically record your reason for the expenditure.

Please accurately prepare and maintain complete records of all accounts, invoices, memoranda and any other documents and records relating to dealings with third-parties, such as clients, suppliers, and business contacts.

Don't keep any accounts 'off-book' to facilitate or conceal improper payments.

Reporting Suspected/Actual Bribery Concerns

If you suspect any suspicious internal or third-party bribery or corruption activity, or if you're not sure if a particular act constitutes bribery or corruption, you must raise your concerns. You can do this either directly with Legal, with your supervisor or manager, or via Olam Agri's Whistleblowing Reporting Line.

We'll investigate all allegations relating to a breach or suspected breach of an applicable law, or this Policy.

The Olam Agri Whistleblowing Policy sets out the process that will be followed and the protections that a whistle blower can expect when they raise such a concern or complaint in relation to reporting any actual or suspected breach of this Policy.

No Recriminations

Olam Agri won't dismiss, harass, or otherwise discriminate against employees who raise concerns in good faith, even if you are mistaken (unless we find that they're spurious or malicious).

Anyone who reports suspected or actual bribery or corruption instances will be given complete anonymity and Olam Agri supports all our employees against any form of action against

them, in relation to their reporting. If you believe that you've suffered any such treatment, please inform Legal immediately.

Internal Audit may review or seek more information if required and decide what action to take with respect to the complaint. If appropriate, we'll pass the complaint on to our senior management.

Training & Communication

Olam Agri ensures that all our existing and new employees know about training on this Policy. This forms part of the induction process for all new employees. All existing employees are required to attend and complete all relevant training on how to implement and observe the Policy.

To apply the necessary controls, we need to manage any potential risk that Olam Agri may be exposed to, we also ensure that employees are given the relevant specific training and guidance to help them address any risks in their field.

We ensure all our suppliers, agents, contractors, and business partners are aware of our zero-tolerance approach to bribery and corruption at the start of our business relationship with them, and we'll keep them informed about it as appropriate.



Consequences of Breach

The consequences for an individual or company being involved in bribery, whether directly or indirectly, are potentially extremely serious.

Under the laws of Singapore, anyone convicted of acts of bribery and corruption may be liable to a fine of up to S\$100,000 and/or to imprisonment for a term not exceeding 5 years.

Increased penalties may be imposed where the offence committed involves transactions, whether contracts, proposals for contracts or tenders, involving government departments or public bodies.

Apart from potential criminal and civil liabilities involving imprisonment and/or a hefty fine, any employees found to be in violation of Olam Agri's ABC Policy will face appropriate disciplinary action, which may extend to immediate termination of their employment or appointment.

We'll also take disciplinary action against employees who are aware of any violations but conceal relevant information from Olam Agri, or who take detrimental action against others who report such violations.

It's not a valid excuse or defence that:

- You didn't intend to personally benefit from the corrupt act or practice but did so for the benefit of some other person, including the Company and/or any of the Group companies.
- You were acting on the instructions of your supervisor(s).
- You personally believe such acts or practices are necessary or justified in order for Olam Agri to remain competitive or profitable in a particular jurisdiction or industry, or to retaliate against the corrupt practices of others (e.g. our competitors).
- You personally believe that such acts or practices are common or normal business acts in a particular jurisdiction or industry.

Monitoring & Review

Our Legal function will regularly monitor and review the effectiveness of this Policy and its implementation, taking its suitability and adequacy into consideration.

Any improvements identified will be made as soon as possible. Our internal control systems and procedures may be subject to regular audits to provide further assurance that they're effective in countering any incidences of bribery and corruption.

Appendix 1

1.1 Unacceptable Conduct

The giving, receiving, or facilitating of a bribe or involvement in any connected activity, in any circumstances, is totally unacceptable to Olam Agri. Examples of forbidden activities are set out below.

It's not acceptable for you or for someone on your behalf to:

- Give, promise to give, or offer a payment, gift or hospitality with the expectation or hope that a business advantage will be received, or to reward a business advantage already given.
- Give, promise to give, or offer a payment, gift or hospitality to a government official, agent or representative to 'facilitate' or expedite a routine procedure.
- Accept payment from a third-party that you know, or suspect is offered with the expectation that it'll obtain a business advantage for them.
- Accept a gift or hospitality from a third-party if you know or suspect that it's offered or provided with an expectation that a business advantage will be provided by us in return.
- Threaten or retaliate against another worker who has refused to commit a bribery offence or who has raised concerns under this Policy.
- Appoint any third-party to act on behalf of Olam Agri who you know or have good reason to believe has engaged in any corrupt or unlawful conduct.
- Pay any third-party (excluding bonafide consultants) for the purposes of making business connections for Olam Agri or engage in any activity that might lead to a breach of this Policy.
- Accept a 'kickback', typically any payment made in return for a business favour or advantage. All Company Employees and Associated Persons must avoid any activity that might lead to, or suggest, that a kickback or facilitation payment will be made or accepted by the Company.

You must also consider and be aware of the fact that a benefit offered or given indirectly, for example through an agent, or a third-party acting on Olam Agri's behalf, can also constitute a bribe.

Appendix 2

2.1 Additional Regulations in the UK & US

UK BA and/or the FCPA apply as follows:

UK BA

- UK nationals: individuals usually resident in the UK; non-UK citizens engaged in prohibited activities in the UK: Companies established and /or conducting business in the UK, including their employees.

FCPA

- Any person with formal ties* to the US; any person with domestic concerns in the US.
- US companies and persons, including citizens, nationals or residents and resident allies**.
- Foreign companies listed on a US Stock Exchange.
- Any person committing any act of bribery or corruption while in the US; and any person acting on behalf of the above categories (i.e. directors, officers, employees, agents, etc.).

2.2 UK Bribery Act

The UK BA sets out the four different bribery offences:

- 1 Offering or giving a bribe to another person.
- 2 Receiving or accepting a bribe.
- 3 Bribing a foreign public official.
- 4 Failure (on the part of a commercial organisation) to prevent bribery (the 'Corporate Offence').

Under the UK BA, a person is guilty of an offence where they offer, promise, or give a 'financial advantage' to another person, where that person either:

- Intends the advantage to bring about an improper performance of a relevant function or an activity by another person to reward such improper performance or
- Knows or believes that the acceptance of the advantage offered, promised or given, constitutes the improper performance of a relevant function or activity.

The Guidance states that improper performance of a function is performance which amounts to a breach of an expectation that a person will act in good faith, impartially, or in accordance with a position of trust.

Under the UK BA, relevant function or activity includes: all functions of a public nature; all activities connected with a business; any activity performed during a person's employment; and any activity performed by or on behalf of a body of persons (whether corporate or unincorporated).

Please note that a function or activity is relevant even if it has no connection with the UK or is performed in a country or territory outside the UK.

* US courts may assert jurisdiction so long as there's use of interstate commerce - through telephone call, email, wire transfer. Even knowledge and inaction would trigger liability.

** A person is classed as a 'resident ally' if they're a US permanent resident from a country allied with the US in a defence effort or are eligible for Federal employment.

2.3 US Foreign Corrupt Practices Act

Under the FCPA, a violation consists of key 'elements'. That is, a person or organisation such as those set out in Appendix 2 can prove the existence of a payment, offer, authorisation or promise to pay money or anything of value to a foreign government official (including a party official or manager of a state-owned concern), or to any other person, knowing that the payment or promise will be passed on to a foreign official indirectly or otherwise, and, with a corrupt motive, and for the purpose of:

- Influencing any act or decision of that person.
- Inducing that person to do or omit any action in violation of his or her lawful duty.

- Securing an improper advantage.
- Inducing that person to use his or her influence to affect an official act or decision to assist in obtaining or retaining business for or with, or directing any business to, any person.

Companies and individuals may also be found liable for failing to prevent bribery, for example, due to wilful blindness (knowing and not acting).

In addition, the FCPA requires issuers of securities to keep accurate books, records and accounts, as well as devise and maintain sufficient internal accounting controls to ensure accuracy.

2.4 Additional Offences

Facilitation Payments (under FCPA)

Facilitation payments are typically small, unofficial payments made to secure, expedite or encourage a routine government action by a government official. They're permitted under the FCPA and are also common in some of the jurisdictions in which Olam Agri may operate. However, Olam Agri has a zero-tolerance approach to facilitation payments, and they shouldn't be made in any circumstances.

If you're asked to make a payment on the Company's behalf, you should always be mindful of what the payment's for and if the amount requested is proportionate to the goods or services provided. You should always ask for a receipt which details the reason for the payment. If you have any suspicions, concerns or queries regarding a payment, especially whether it could be deemed to be a prohibited facilitation payment, you should raise these with the Legal function.

Receiving a Bribe (UK BA)

Example: A supplier gives your nephew a job but makes it clear that in return they expect you to use your influence in our organisation to ensure we continue to do business with them.

It's an offence for a supplier to make such an offer. It would be an offence for you to accept the offer as you would be doing so to gain a personal advantage.

Bribing a 'Foreign Official' (UK BA and FCPA)

Example: You arrange for the business to pay an additional payment to a foreign official to speed up an administrative process, such as clearing our goods through customs.

You've committed the offence of bribing a Foreign Official as soon as the offer is made. This is because it's made to gain a business advantage for us.

A Foreign Official is a person who:

- Holds any legislative, administrative, or judicial position.
- Exercises a public function for a country, or a public agency or public enterprise of that outside country.
- Is an official or agent of a public international organisation, the UN or the World Bank, for example.

Examples of Foreign Officials include:

- Civil servants
- Professional judges and lay judges
- Public prosecutors
- Employees of a public authority (tax office, building authority, Ministry of Energy), as well as inspecting and certification authorities
- Employees of municipal utilities

- Ministers, Parliamentary State Secretaries, Data Protection Supervisors or notary publics.

A Foreign Official need not necessarily work for a government. Liability arises if a foreign public official is bribed with the intent:

- To influence the foreign public official in his/her official capacity.
- To obtain or retain business or an advantage in the conduct of business.
 - The offence includes bribes given to another person at the request or with the acquiescence or assent of the Foreign Public Official.
 - However, if the giving of a payment/gift/hospitality is explicitly permitted by written local law, then the individual giving the payment/gift won't be deemed to have breached the UK BA or the FCPA.
 - The availability of this defence is extremely rare – acceptance of bribery of foreign public officials being the local custom or mode of business is not a defence.
 - Any defence must be set out in writing. Company Employees and Associated Persons shouldn't rely on this defence without first seeking advice from the Legal function.

2.5 Failure (on the part of a commercial organisation) to prevent bribery (UK BA only)

In relation to the prescribed Corporate Offence, which is a new strict liability offence, Olam Agri would be liable where the bribe is made by any Associated Person performing services for, or on behalf of, Olam Agri (this includes employees, subsidiaries, branches or other third-parties in other jurisdictions).

An Associated Person is a person who provides services for or on behalf of the organisation, in any capacity, including but not limited to, employees, agents, and subsidiaries.

The liability will arise if the associated person:

- Offers a financial or other advantage
- Intends to obtain or retain business or an advantage in the conduct of business for the organisation.

The Corporate Offence applies to Olam Agri on the basis that it carries out part of its business in the UK. It applies regardless of where the bribery by the Associated Person occurred in the world.

Consequently, that person's actions need not occur in the UK, and need not have a connection with the UK.

Appendix 3

1.1 Red Flags

The following is a list of possible red flags that may arise during your employment with us, and which might raise concerns under various anti-bribery and corruption laws.

The list isn't intended to be exhaustive and is for illustrative purposes only. If you encounter any of these red flags while employed by the Company, you must report them promptly to the Legal function:

- You become aware that a third-party engages in – or has been accused of engaging in – improper business practices.
- You learn that a third-party has a reputation for paying bribes, or requiring that bribes are paid to them, or has a reputation for having a 'special relationship' with foreign government officials.
- A third-party insists on receiving a commission or fee payment before committing to sign up to a contract with us, or carrying out a government function or process for Olam Agri.
- A third-party requests payment in cash and/or refuses to sign a formal commission or fee agreement, or to provide an invoice or receipt for a payment made.
- A third-party requests that payments made to a country or geographic location different from where the third-party resides or conducts business.
- A third-party requests an unexpected additional fee or commission to 'facilitate' a service.
- A third-party demands lavish entertainment or gifts before commencing or continuing contractual negotiations or provision of services.
- A third-party request that a payment is made to 'overlook' potential legal violations.
- A third-party request that you provide employment or some other advantage to a friend or relative.
- You receive an invoice from a third-party that appears to be non-standard or customised.
- A third-party insists on the use of side letters or refuses to put terms agreed in writing.
- You notice that Olam Agri has been invoiced for a commission or fee payment that appears large given the service stated to have been provided.
- A third-party requests or requires the use of an agent, intermediary, consultant, distributor, or supplier that is not typically used by or known to Olam Agri.
- A third-party requests a split of purchases to avoid procurement thresholds.
- A third-party is vague or elusive about source of funds for the transaction or activity.
- A third-party requests that the Company not report or disclose a particular activity or transaction.
- A third-party threatens to withhold services absent payments to individuals in addition to contractually agreed payments, or payments in cash or cash equivalents.
- A government official insists on a specific person or company to serve as third-party.
- A third-party refuses to agree to the contractual provisions relating to anti-bribery and anti-corruption.
- During negotiations, the third-party seems indifferent to the price for the Company products or services, or otherwise fails to act in a profit seeking manner.
- A third-party insists that its identity remains confidential or refuses to divulge the identity of its owners or principals.
- A third-party does not have offices or a staff, or frequently moves locations, or you're offered an unusually generous gift or offered lavish hospitality by a third-party.



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