



# Anti-Bribery and Corruption Policy

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## STATEMENT OF POLICY

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We are committed to fair and responsible business and prohibit all forms of bribery and corruption, as well as any business conduct that could create the appearance of improper influence.

Our commitment to anti-bribery and anti-corruption is articulated in Code of Ethics and Professional Code. Quantum Insurance Ltd (hereinafter referred to as the “Company”) takes a zero-tolerance approach to bribery and corruption and is committed to acting professionally, fairly and with integrity in all its business dealings and relationships.

It is the goal of the Company to avoid acts which might reflect adversely upon the integrity and reputation of the Company.

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## PURPOSE & SCOPE OF THIS POLICY

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The anti-bribery and anti-corruption policy uses an implementation model which allows for a locally focused but globally conscious to anti-bribery and anti-corruption mitigation program supported by appropriate and proportionate procedures.

Our anti-bribery and anti-corruption policy and supporting framework are aligned with the Prevention of Corruption Act 2002, Criminal Code Act 1838 and other guidance, and prepares the Company to meet internal and external expectations, today and in the future.

Compliance with this Policy constitutes terms of service for each director, conditions of employment for each officer and employee, and conditions of providing services to the Company for each outsourced function and third parties.

In the context of this policy, third-party refers to any individual outside the Company or organisation that the company meets and works with. It refers to actual and potential clients, customers, suppliers, distributors, business contacts, agents, advisers, and government and public bodies – this includes their advisors, representatives and officials, politicians, and public parties.

All employment contracts will contain a specific clause to the abidance to the present Policy.

Any arrangements our company makes with a third party is subject to clear contractual terms, including specific provisions that require the third party to comply with minimum standards and procedures relating to anti-bribery and corruption.

Each such person agrees to be bound by the provisions of this Policy upon notification of the most recent copy being given to them or upon notification that an updated version has been placed on the Company's website for review.

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## PROCEDURES FOR IMPLEMENTATION

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For a clear and unambiguous application of this Policy, the definition of the terms is paramount to the good implementation of the present Policy.

“Service Providers” for an Insurance Company shall include but not limited to:

- i. Reinsurers
- ii. Motor / Non-Motor Surveyors
- iii. Garages and repairers
- iv. Replacement cars providers
- v. Banks
- vi. Brokers
- vii. Legal & compliance services and company secretary
- viii. Information and Technology

Service Providers shall provide services that are those which are not directly involved in the main activities of the business which deliver the service of Insurance.

“Outsourced functions” for an Insurance Company shall include but not limited to:

- i. Insurance Agents and Salespersons
- ii. Customer Service – call centre
- iii. Recruitment and HR
- iv. Internal audit

Outsourcing is where the Company elect to contract out a 'core' processes of its main business activity.

A “government official” is any:

- i. individual elected or appointed to a governmental entity,
- ii. official or employee of a government,
- iii. official or employee of a company wholly or partially controlled by a government (such as
- iv. state-owned companies),
- v. candidate for political office,
- vi. political party or official of a political party, or
- vii. person acting in an official capacity for any of the above regardless of rank or position

A “bribe” is an inducement or reward offered, promised or provided to any person in order to gain any commercial, contractual, regulatory or business or personal advantage. A bribe to a government official is broad and can occur even when the benefit being offered is small, such as gifts, entertainment, and even business meals.

An “inducement” is something which helps to bring about an action or desired result.

A “business advantage” means that the Company, its directors, employees, consultants, service providers and outsourced functions are placed in a better position (financially, economically, or reputationally, or in any other way which is beneficial) either than it would otherwise have been had the bribery or corruption not taken place.

“Kickbacks” are payment of any portion of a contract made to employees of another contracting party or the utilisation of other techniques, such as subcontracts, purchase orders or consulting agreements, to channel payment to public officials, political parties, party officials or political candidates, to employees of another contracting party, or their relatives or business associates.

### 1. Gifts and hospitality

The Company may accept normal and appropriate gestures of hospitality and goodwill (whether given to/received from third parties) only under the following situation:

- i. It is given in the name of the company, not in an individual's name; or
- ii. It is appropriate for the circumstances (e.g., giving small gifts around Christmas or birthdays) and
- iii. It is given/received openly, not secretly; and
- iv. It does not include cash or a cash equivalent (e.g., a voucher or gift certificate); and
- v. It is not selectively given to a key, influential person, clearly with the intention of directly influencing them; and
- vi. It is not above a certain excessive value, as pre-determined by the Corporate Governance Committee (usually in excess of MUR. 500); and
- vii. It is not an offer to, or accepted from, a government official or representative or politician or political party; and
- viii. Where it is inappropriate to decline the offer of a gift, the gift may be accepted so long as it is declared to the Compliance & Ethics Officer who shall log it in the Gift and Corporate Hospitality Register and submit same to the Corporate Governance Committee, who will assess the circumstances.

As good practice, gifts given and received should be documented in the Gifts and Corporate Hospitality Register (**Annexure 4**) kept by the Compliance & Ethics Officer and be tabled at the Corporate Governance Committee meetings.

Gifts from suppliers should always be disclosed.

### 2. Inducement and Kickbacks

The Company does not accept and will not make any form of facilitation payments of any nature.

The Company prohibits employees from offering or providing corrupt payments and other advantages to or accepting the same from private (non-government) persons and entities. Such payments constitute commercial bribery and are often called "kickbacks."

We recognise that inducement and kickbacks may be a form of bribery that involves expediting or facilitating the performance of a public official for a routine governmental action.

The Company is totally refractory to Inducements and Kickbacks. This conduct is prohibited in any case whatsoever and immediately reported as a violation of the present Policy. If any failure from any employee to report, this may be interpreted as complicity to the act.

### 3. Political Contributions

The Company will not make donations, whether in cash, kind, or by any other means, to support any political parties or candidates.

### 4. Charitable Contributions

The Company is favourable to donate to charitable institutions as part of its contribution to the needy and society as a whole; however, any contribution recommended to the Board by the Corporate Governance Committee and the following criteria will apply:

- i. to ensure that charitable contributions are not used to facilitate and conceal acts of bribery.
- ii. to ensure that all charitable donations made are legal and ethical under local laws and practices.

**REPORTING VIOLATIONS**

**ANNEXURE 1** are the procedures applicable for Violations, Reporting and treatment of the Reporting by the Company.

Any conduct that may violate this Policy, any person may report as follows to the Company’s Compliance & Ethic Officer:

- i. by filling-in the Complaint’s Form (QUANTUM-WF-01) – **ANNEXURE 3**. The Form can be downloaded from the Website.
- ii. by email at \_\_\_\_\_.
- iii. by phone on \_\_\_\_\_

Suspected violations will be reviewed and investigated as appropriate and may lead to disciplinary action.

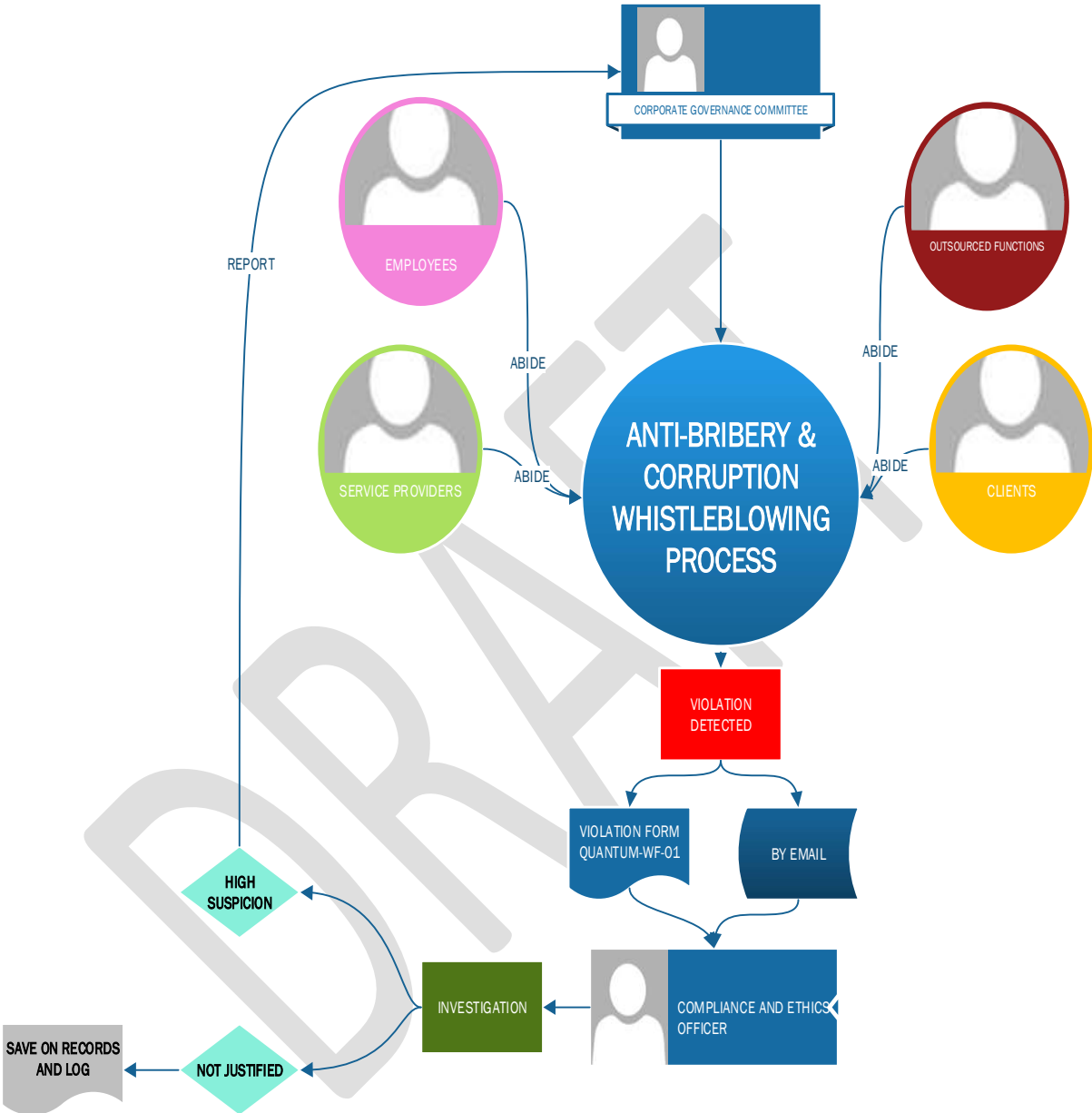
Any such reporting will be treated as confidential to the extent permitted by law.

The Company strictly prohibits retaliation for good faith reports of suspected misconduct.

Failure to report a violation of this Policy constitutes an independent violation of this Policy and will be subjected to discipline, up to and including termination of employment or contract as the case may be.

<b>Entity</b>	QUANTUM INSURANCE LTD	
<b>Chief Executive Officer</b>	Name: Devesh Biltoo Email Address: <a href="mailto:devesh.biltoo@quantuminsurance.com">devesh.biltoo@quantuminsurance.com</a>	Sig: _____
<b>Initial Approval by the Board of Directors on</b>	July 2022	
<b>Updated on</b>	Date	Board Approval Dated:

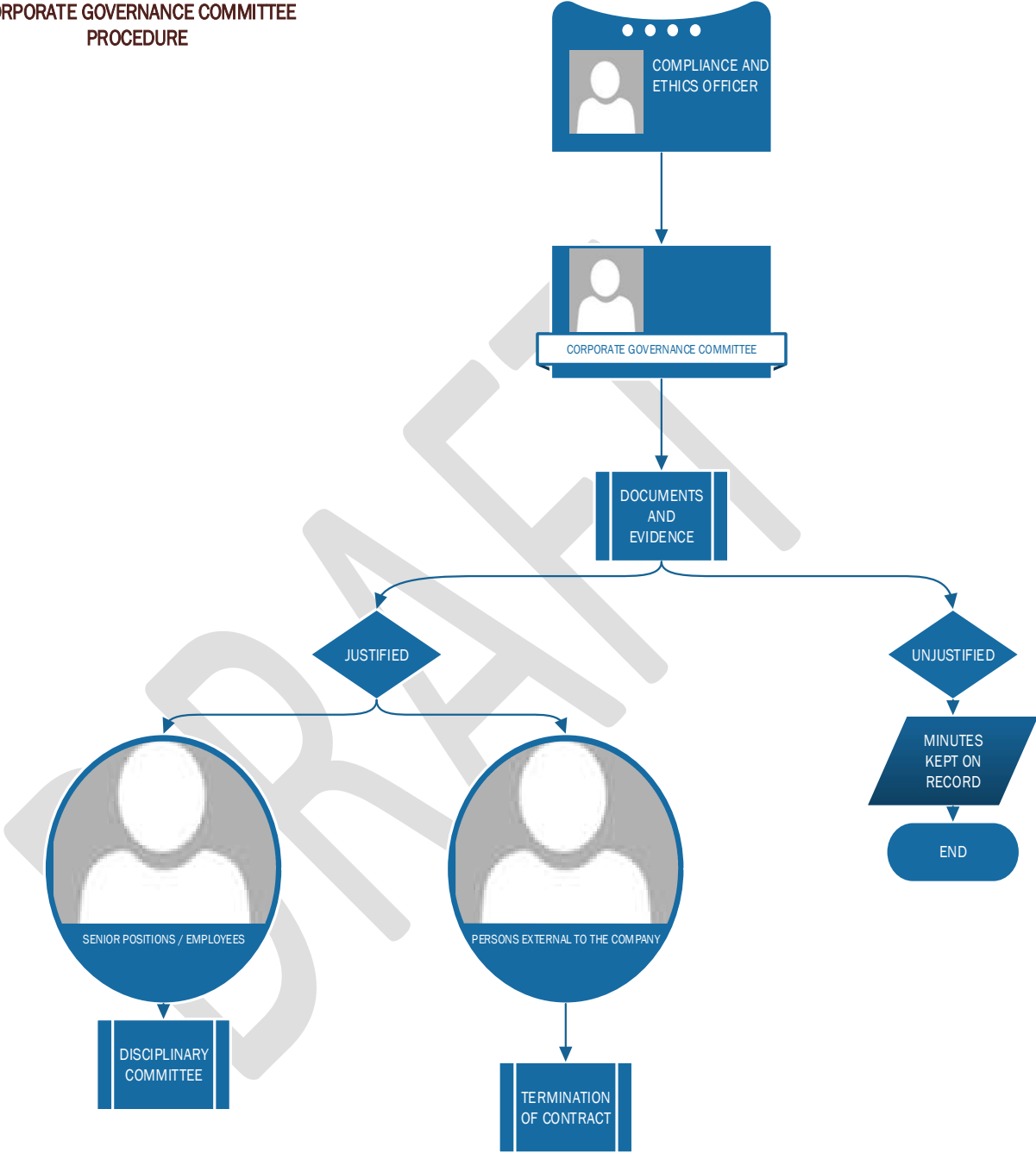
ANNEXURE 1





ANNEXURE 2

CORPORATE GOVERNANCE COMMITTEE  
PROCEDURE



**ANNEXURE 3**

WHISTLEBLOWING FORM - QUANTUM-WF-01

REPORTER'S PARTICULARS	
Name	
Position	
Department	
Are you an Employee	<input type="checkbox"/> YES <input type="checkbox"/> NO
Are you a Service Provider / Consultant?	<input type="checkbox"/> YES <input type="checkbox"/> NO
Mobile	
Home Phone	
What is the best time/ place to contact you?	

SUSPECT'S PARTICULARS	
Name	
Position	
Department	
Is the Suspect an Employee of Quantum?	<input type="checkbox"/> YES <input type="checkbox"/> NO
Is the Suspect a Service Provider / Consultant?	<input type="checkbox"/> YES <input type="checkbox"/> NO
Does the Suspect an Employee of the Service Provider / Consultant?	<input type="checkbox"/> YES <input type="checkbox"/> NO
Mobile	
Phone Number	
What is the best time/place to contact you?	

DESCRIPTION OF SUSPECTED VIOLATION *(please provide a full and detailed narration and attach evidence, if any).*

What wrongdoing occurred?
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Who did the wrongdoing?

When did this occur?

Where did this happen (Unit, location)?

What circumstances enabled this to happen (How)?

Are there any Witnesses to the suspected violation? If yes, please provide names, addresses and phone number

Name	Address	Phone number

Dated this \_\_\_\_\_ Name \_\_\_\_\_

**ANNEXURE 4**

**GIFTS AND CORPORATE HOSPITALITY REGISTER**

Date provided	Details of the gift and/or hospitality	Gift/hospitality provider	Value	Recipient	Other information & Comments	Compliance / Ethics Officer Signature

Viewed by Corporate Governance Committee on \_\_\_\_\_

Comments / Outcome /Instruction:

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\_\_\_\_\_  
Signature  
Chairman of Corporate Governance Committee