



ANTI-BRIBERY AND CORRUPTION POLICY

POLICY GOVERNANCE

Policy Owner: Group Risk and Compliance

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Applicable: This policy is applicable to all colleagues, contractors and those acting on Informa's behalf globally

Classification: Internal Policy

General Enquiries: compliance.officer@informa.com

Other guidance: Please also read the [Gifts & Entertainment Policy](#)

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INTRODUCTION

Whoever we may deal with, and wherever we may operate, we are committed to doing so lawfully, ethically and with integrity. As part of this commitment, all forms of bribery and corruption are unacceptable and will not be tolerated. We, and any third party acting on our behalf, must not act corruptly in our dealings with any other person.

This anti-bribery and corruption policy sets out Informa's approach to the prevention of acts of bribery and corruption and procedures that will help us comply with global legislation governing bribery and corruption.

KEY PRINCIPLES

- We must never offer, authorise, or accept bribes, including 'facilitation payments' (i.e. small payments made to speed up what should be routine action), or any other form of improper payments with the intention of obtaining a commercial benefit for Informa
- We should ensure all accounts and financial records are complete and accurate, that it is clear what each transaction relates to, and that there are no undisclosed, unrecorded or vaguely described transactions, in particular with regard to any gifting or entertainment, whether given or received
- Undertake appropriate background checks on a potential business partner, so that you can be as confident as possible that they meet the high standards of ethical behaviour we expect of those acting on our behalf
- Get approval from your local lawyer or Chief Finance Officer for any gift or entertainment that involves a government official
- If you are offered or asked for a bribe you must refuse – and report it immediately to your local lawyer, Group Compliance or via Speak Up.

CONTEXT

Governments across the world have put in place anti-bribery laws, many of which give them jurisdiction over individuals and companies outside their national boundaries. As a global company, we are subject to such laws wherever we do business and must ensure that we are aware of and comply fully with all relevant laws and regulations.

As part of Informa's commitment to prevent bribery and corruption, we have developed this policy to set out the standards we expect of all our colleagues in respecting those laws and regulations.

WHAT IS BRIBERY?

A bribe can be anything either offered or accepted, financial or another advantage that is intended to create undue influence, induce or reward the improper performance of a business or public function. It does not matter whether the bribe is given or received directly or through a third party (such as someone acting on Informa's behalf, for example an agent, distributor, supplier, joint venture partner or other intermediary); or for the benefit of the recipient or some other person.

Bribes can take many forms, for example:

- Money (or cash equivalent such as shares)
- Unreasonable gifts, entertainment or hospitality
- Kickbacks
- Unwarranted rebates or excessive commissions (e.g. to sales agents or marketing agents)
- Unwarranted allowances or expenses
- "Facilitation" payments/payments made to perform their normal job more quickly and/or prioritise a particular customer
- Political/charitable contributions
- Uncompensated use of company services or facilities; or
- anything else of value.

HOW DO I KNOW IF SOMETHING IS A BRIBE?

In most circumstances, common sense will determine when a bribe is being offered. However, here are some questions you should ask yourself if in doubt:

- Am I being asked to pay something or provide any other benefit over and above the cost of the services being performed, for an example an excessive commission, a lavish gift, a kickback or make a contribution to a charity or political organisation?
- Am I being asked to make a payment for services to someone other than the service provider?
- Are the hospitality or gifts I am giving or receiving reasonable and justified? Would I be embarrassed to disclose them?
- When a payment or other benefit is being offered or received, do I know or suspect it is to induce or reward favourable treatment, to undermine an impartial decision making process or to persuade someone to do something that would not be in the proper performance of their job?

POLICIES AND PROCEDURES

GENERAL PROHIBITION

All forms of bribery and corruption are prohibited. We will not tolerate any act of bribery or corruption. Any breach of this policy or local law could result in disciplinary action being taken and ultimately could result in dismissal.

A bribe does not actually have to take place - just promising to give a bribe or agreeing to receive one is prohibited.

Whether you are dealing with a person from the public or private sector, the provisions of this policy are the same

and any risk of even an allegation of bribery must be avoided. It is worth considering though, that many countries have specific controls regarding dealing with public officials and be careful to pay particular attention to any specific requirements in these circumstances.

GIFTS, ENTERTAINMENT AND EXPENSES

Giving or receiving gifts or entertainment is often an important part of maintaining and developing business relationships. However, all gifts and entertainment should be for a genuine purpose, reasonable, given in the ordinary course of business and should comply with the Informa **Gift and Entertainment Policy** and local laws. Lavish or unreasonable gifts or hospitality, whether these are given or received, are unacceptable as they can create the impression that we are trying to obtain or receive favourable business treatment by providing individuals with personal benefits. In addition, gifts and hospitality can themselves be a bribe. Be careful to avoid even the appearance that the giving or accepting of gifts or hospitality might influence the decisions you take on behalf of Informa.

FACILITATION PAYMENTS

Facilitation payments are any payments, no matter how small, given to an official to increase the speed at which they do their job. For example, this could include speeding up customs clearance.

All facilitation payments are prohibited. However, your safety is our primary concern and we understand that, in very rare and exceptional circumstances, you may find yourself in a situation where you feel you have no alternative but to make a facilitation payment in order to protect against loss of life, limb or liberty. Any request for a facilitation payment should be reported to your local anti-bribery and corruption officer.

AGENTS, DISTRIBUTORS, SUPPLIERS AND JOINT VENTURE PARTNERS

Informa could be liable for the behaviour of people that act on our behalf. Accordingly, where we engage contractors, agents, distributors, suppliers or joint venture partners (together referred to as “third parties”), we have an obligation to complete sufficient due diligence when entering into arrangements to ensure that they are not acting corruptly, and to monitor their performance periodically to ensure ongoing compliance. In short, if we can’t do it, neither can they.

Appropriate due diligence should be undertaken before we engage a third party, the level of which will vary depending on the circumstances and you should use your judgement on a case by case basis.

The first step is to run all third parties through our due diligence checking tool (available on the intranet) to see what next steps you should consider taking.

As a minimum we all third parties should be made aware of the terms of the Informa **Business Partner Code of Conduct** and of their obligations to comply with it.

In addition, all arrangements with third parties should be subject to clear contractual terms, including specific provisions requiring them to comply with minimum standards and procedures in relation to bribery and corruption. Appropriate wording to be included in contracts can be obtained from your local Legal counsel.

We must not engage any third party who we know, or reasonably suspect, of engaging in bribery.

When conducting due diligence, questions you should be asking yourself include:

- Who are they – have I seen documents evidencing that they are who they say they are?
- Who else have they worked with – do they have references?
- Are they well established with a good reputation or are they more obscure so that I need to do more to find out about them?

- Do they operate in a territory where bribery is prevalent? Are they happy to sign a contract agreeing to comply with anti-bribery procedures? Do they have their own anti-bribery programme?
- Have I done basic Google searches, business directory searches, etc.?
- Are there inconsistencies between the provider of the services and the person I am paying?
- Are commissions/payments in line with generally accepted market practice?

Some high risk transactions will require further due diligence which may require independent investigation. In particular, any joint venture arrangement must have appropriate due diligence conducted and prior approval from Group Legal before being entered into.

All payments and commissions to third parties must:

- Be made in accordance with the Group Authority Framework and the local policies relevant in your business as set by your line manager
- Be made via bank transfer through the accounts payable system and be fully accounted for
- Be in line with generally accepted rates and business practice for the service in question and should not be unjustifiably excessive or unsupportable; and
- Be made in accordance with the terms of the contract with the person or company providing the services.

If you have any concerns that arrangements with a third party are not in accordance with this policy, you should ask your local lawyer or Group Compliance for help.

DEALING WITH PUBLIC OFFICIALS

Although this policy applies to both public and private sectors, dealing with public officials poses a particularly high risk in relation to bribery due to the strict rules and regulations in many countries.

Public officials include those in government departments, but also employees of government owned or controlled

commercial enterprises, international organisations, political parties and political candidates.

The provision of money or anything else of value, no matter how small, to any public official for the purpose of influencing them in their official capacity is prohibited.

Prior approval from your local anti-bribery and corruption officer is required for:

- Any payment in respect of fees, salary or commission (this does not include official fees)
- Gifts and hospitality, and
- Making charitable contributions or political donations in connection with dealings with a public official.

In addition, many public officials have their own rules regarding the acceptance of gifts and hospitality, etc., and we must respect these rules where applicable.

COMPLIANCE WITH THE POLICY

Each of us has an obligation to act with integrity and to ensure that we understand and comply with the policy.

All colleagues will be required to confirm that they have understood and will comply with the policy when joining Informa. Training will be provided to relevant employees throughout the group to support them in complying with their responsibilities. If you are not selected for training but believe that it is relevant for you then please ask your local HR manager or Group Compliance for further information.

A breach of bribery laws can result in fines for both the company and the individual involved and in some jurisdictions could also result in imprisonment. Failure to comply with this policy, whether or not this is intentional, may lead to disciplinary action (up to and including dismissal), and criminal liability for the individual involved (up to and including imprisonment).

SPEAKING UP

Informa is committed to ensuring that colleagues can speak up with confidence if they have any concerns or need to ask for help.

If any of us observes or suspects something improper, unethical or inappropriate, we all have an obligation to speak up. In the first instance, you should raise your concerns with:

- your line manager
- HR
- Group Compliance.

If you would feel more comfortable talking to someone else, you can report your concerns in confidence through our whistleblower line, **Speak Up**, which is operated by an external third party provider, Navex. You can make a report in your own language either via their website, or telephone line:

- www.informaspeakup.ethicspoint.com
- international number: +44 (0)808-234-7287

For local telephone numbers for other countries, please visit the Speak Up website.

ZERO RETALIATION

Informa will not tolerate retaliation in any form against anyone for raising concerns or reporting what they genuinely believe to be improper, unethical or inappropriate behaviour. All reports will be treated confidentially.