

Anti-Corruption and Bribery Policy for Data Storage



1. Introduction

At Safe 2 Open*, we are committed to conducting our business with integrity, transparency, and in compliance with all applicable laws and regulations. Corruption and bribery are detrimental to our core values and undermine trust in our organisation. This policy outlines our commitment to preventing corruption and bribery in the context of data storage activities.

2. Scope

This policy applies to all employees, contractors, vendors, and partners of Safe 2 Open* who are involved in data storage activities or interact with data storage providers on behalf of the company.

3. Policy Statements

3.1 Zero Tolerance

Safe 2 Open* has a zero-tolerance policy towards corruption and bribery in any form, including but not limited to:

- Offering, promising, giving, or accepting any form of bribe, kickback, or improper payment to or from any individual or entity.
- Facilitating or participating in corrupt practices to gain an unfair advantage.
- Engaging in unethical behaviour related to data storage procurement, management, or security.

3.2 Compliance with Laws and Regulations

All employees and representatives of Safe 2 Open* must comply with the anti-corruption laws and regulations of the countries and regions in which we operate, including but not limited to the U.S. Foreign Corrupt Practices Act (FCPA) and the UK Bribery Act.

3.3 Due Diligence

Before engaging with any data storage provider, employees must conduct thorough due diligence to ensure the provider has a reputation for ethical conduct and complies with anti-corruption laws. This includes reviewing the provider's background, reputation, and any past allegations or investigations related to corruption or bribery.

3.4 Transparency

All transactions, agreements, and interactions with data storage providers must be transparent and accurately documented. Any gifts, entertainment, or other benefits offered or received in connection with data storage activities must be disclosed in accordance with company policies and applicable laws.

3.5 Reporting and Whistleblowing

Employees are encouraged to report any suspicions or concerns regarding corruption or bribery in data storage activities. Reports can be made through the company's established reporting channels, including but not limited to HR, compliance, or anonymous whistleblowing hotlines. Safe 2 Open* is committed to protecting whistleblowers from retaliation.

3.6 Consequences of Non-Compliance

Violations of this policy will result in disciplinary action, up to and including termination of employment or contract termination, as well as potential legal consequences. Safe 2 Open* reserves the right to take appropriate action against any individual or entity found to have engaged in corrupt or unethical behaviour related to data storage activities.

4. Training and Awareness

Safe 2 Open* will provide regular training and awareness programs to ensure all employees and representatives understand their responsibilities under this policy and are equipped to identify and prevent corruption and bribery in data storage activities.

5. Review and Update

This policy will be reviewed periodically to ensure it remains effective and up to date with evolving legal requirements and best practices in anti-corruption compliance.

6. Conclusion

By adhering to this policy, we reaffirm our commitment to conducting business with integrity, honesty, and respect for the law. Together, we can uphold the highest standards of ethical conduct in all our data storage activities.

Safe 2 Open* Leadership Team

11th March 2024

* Safe 2 open is a trading name of TWH holdings Limited