

## **Arch & Godfrey (Cayman) Ltd.**

### **Anti-Bribery Policy**

*Last Updated August 2025*

Unchecked bribery will destroy the integrity and ethical foundations of any public or private institutions. Economic globalization means that the damaging impact of commercial bribery that seeks to subvert open competition in business transactions, has now moved beyond unilateral national policies and has become a global problem.

Although the problem is global in nature, the UK Bribery Act 2010 (the "Act") has introduced specific personal requirements on UK residents and nationals, including those holding British Overseas Territory passports and very specific corporate requirements on entities conducting business from, in or through the UK.

Arch & Godfrey supports combating the risks associated with bribery and providing protection against prosecution and the Board of Directors have approved the Bribery Policies and Procedures. Please familiarize yourself with the policy as they demonstrate our commitment to conducting business honestly, fairly and with transparency. Arch & Godfrey has a zero tolerance policy towards bribery. Furthermore, it will be considered a fundamental breach of the terms of your employment if you contravene these rules which may result in immediate dismissal without notice or payment in lieu of notice, and possible civil or criminal action being taken against you.

If you become aware or suspect that any of our clients, contacts or employees may be involved in bribery or corruption you must immediately inform Human Resources and the Managing Director.