

Anti-Corruption Policy

Globetrotters Legal Africa

1. Purpose

This policy affirms Globetrotters Legal Africa's commitment to integrity, transparency, and ethical conduct across all jurisdictions. It is designed to prevent, detect, and respond to corruption in accordance with Ghanaian law and major international anti-corruption instruments.

2. Scope

Applies to:

- All employees, consultants, and interns
- Partners, vendors, and third-party representatives
- All jurisdictions where Globetrotters Legal Africa operates or provides services

3. Definition of Corruption

Corruption includes:

- Bribery (public or private sector)
- Facilitation payments
- Kickbacks or commissions for improper advantage
- Abuse of entrusted power for private gain
- Undisclosed conflicts of interest

4. International Legal Frameworks

Globetrotters Legal Africa is committed to compliance with the following international instruments:

- (i) US Foreign Corrupt Practices Act (FCPA)
- (ii) UK Bribery Act (2010)
- (iii) African Union Convention on Preventing and Combating Corruption

5. Policy Statement

Globetrotters Legal Africa maintains a **zero-tolerance** stance on corruption. All personnel must:

- Refuse bribes or improper inducements
- Avoid facilitation payments, even if customary
- Disclose and manage conflicts of interest
- Maintain accurate records of all financial and operational transactions
- Comply with both local and international anti-corruption laws

6. Gifts

Gift giving or acceptance is strictly prohibited under all circumstances

7. Third-Party Engagements

Before engagement:

- Conduct due diligence
- Include anti-corruption clauses in contracts
- Monitor compliance regularly

8. Reporting and Whistleblowing

- Reports may be made confidentially to the Compliance Officer
- Whistleblowers are protected from retaliation
- Investigations will be impartial and timely

9. Training and Awareness

All staff will receive regular training on:

- Anti-corruption laws and ethical conduct
- Reporting mechanisms
- International compliance obligations

10. Compliance and Enforcement

Violations may result in:

- Disciplinary action or termination
- Legal referral to authorities
- Contract termination for third parties

11. Review and Updates

This policy will be reviewed annually to reflect:

- Legal developments in Ghana and abroad
- Expansion into new jurisdictions



