

# Ceffu Custody FZE's Anti-Bribery and Corruption Policy

*Updated: July 2025*

Ceffu Custody FZE (“**Ceffu**”) has established its Anti-Bribery and Corruption (ABC) program for the company.

## **Scope**

This policy applies to all Board Members, officers, employees, dependents, consultants, contractors and associated parties of the firm (“**Staff**”).

## **Anti-Bribery and Corruption**

The Firm has zero appetite towards bribery and corruption in any form. All Staff must act professionally, fairly, and with integrity in all business dealings and relationships.

Staff will be trained per the ABC policy and informed of the possible ways of reporting to the Compliance Officer (CO) any violation that they become aware of. The CO is the responsible person for investigating and reporting violations or possible violations of any ABC rules.

It is prohibited for any Staff to:

1. Give, promise to give, or offer, a payment, gift or hospitality to a third party or otherwise engage in or permit a bribery offence to occur, with the expectation or hope that an advantage in business will be received or to reward a business advantage already given;
2. Give, promise to give, or offer, a payment, gift or hospitality to a third party to facilitate or expedite a routine procedure;
3. Accept a payment, gift or hospitality from a third party if he/she knows or suspects that such payment, gift or hospitality is offered or provided with an expectation that a business advantage will be provided in return;
4. Threaten or retaliate against another member of the Board or Staff who has refused to commit a bribery offence or who has raised concerns; and
5. Engage in any activity that might lead to a breach of the ABC Rules in VARA Part VI of the Compliance and Risk Management Rulebook.

## **No Corrupt Payments**

All Staff of the firm are prohibited to make any payment(s) to a third party where there is any reason to believe that all or any part of such payment will go towards a bribe or otherwise facilitate any corruption.

All payments made by VASPs for services must be appropriate and justifiable for the purpose of legitimate services provided.

## **Investigation and reporting**

Contact us through the following methods when you identify any violation or possible violation of any applicable laws and regulations relevant to ABC by the VASP, or its Board or Staff on its behalf:

- Email to: [compliance\\_dubai@ceffu.com](mailto:compliance_dubai@ceffu.com)
- Phone +971-4-5232416

The CO shall investigate any report of a violation or possible violation of the ABC Rules in Part VI of the Compliance and Risk Management Rulebook and shall:

- a. Investigate any reports of a violation or possible violation of the ABC rules;
- b. The CO will appoint an independent Entity who shall promptly commission the conduct of an investigation;
- c. The CO will advise the Board of the existence of an investigation;
- d. On completion of the investigation, a written investigation report will be provided by the Entity employed to conduct the investigation to the CO;
- e. If any unlawful conduct is found, the Firm will take such remedial action as the Board deems appropriate to achieve compliance with its internal ABC policy and all applicable ABC laws; and
- f. The written investigation report and a written summary of the remedial actions taken shall be retained by the CO for a period of no less than eight (8) years from completion of the remedial action. Such reports shall be made available to VARA upon request.

### **Information and Training**

The Firm will implement and provide an ABC training programme for all Staff on a regular basis and monitor their compliance with all established procedures. All Staff must participate in all such training as part of the induction programme as well as on a periodic basis.

### **Policy Responsibility**

The Board will have the overall responsibility for ensuring that the Firm's ABC policy is up-to-date and complies with all applicable laws and regulations in all jurisdictions where the Firm conducts its business.

The CO has the primary and day-to-day responsibility for implementing the ABC policy and for monitoring its effectiveness.

### **Consequences**

Failure to comply with the Firm's ABC policy will result in severe consequences, including and not limited to internal disciplinary action and termination of employment without notice.