

ANTI-BRIBERY & CORRUPTION COMPLIANCE



Clever Energy group is committed to conducting business in accordance with the highest ethical standards and in full compliance with all applicable local anti-bribery and corruption laws of the countries in which Clever Energy operates, including the U.S. Foreign Corrupt Practices Act, the U.K. Bribery Act, etc.

One of Clever Energy's core principles is its commitment to responsible finance – conduct that is transparent, prudent, and dependable. Our AB&C Program embodies this principle.

Clever Energy has in place written policies and internal controls reasonably designed to comply with anti-bribery and corruption laws.

Program includes: oversight and governance; a risk assessment process; communication and training; review and pre-approval processes; due diligence on third party relationships; confidential reporting; financial controls and record-keeping; and independent testing processes.

Employees are prohibited from offering, requesting, or accepting bribes and other improper financial advantages, such as to obtain or retain business or any advantage, financial or otherwise.

Policy extends to clients, suppliers, and any person with whom Clever Energy does or anticipates doing business. Clever Energy expressly prohibits the provision of facilitation payments. We expect all of our partners to act at all times in compliance with applicable anti-bribery and corruption laws and regulations.

Employees who violate policy are subject to disciplinary action, including termination.