

Assessment, policy and goals

Description of the relevance of anti-corruption for the company (i.e. anti-corruption risk-assessment). Description of policies, public commitments and company goals on anti-corruption.

We operate a multi-faceted compliance and ethics program across the Group that's tailored to our diverse activities and the complexities of global trade flows.

In addition to the strong standards communicated by the Group's Board and Management, the Compliance and Risk function has grown along with the size and geographical reach of our activities. There is a dedicated Trade Practice Compliance department ensuring that businesses are concluded with integrity complying with global anti-corruption and bribery standards. This department is responsible for implementing policy and controls for the avoidance of corruption and fraud. In addition the body advises on trade practice compliance, training, risk mapping and the policy determination for whistle blowing. It ensures that we do not engage in corrupt practices and monitors compliance and selection of adequate business partners. We also refrain from any business activity that does not uphold our ethical standards.

Our Group Code of Conduct prohibits employees from making or receiving any inappropriate pecuniary or other benefit from customers, suppliers, public officials or any other business relations or partners.

We also have a Compliance & Internal Audit Committee that meets monthly to review issues of control and conduct that specifically discusses any issues of corruption that may arise in the Company's field of business. In addition, our strong and comprehensive governance structure is managed by a Chief Compliance & Risk Officer reporting to the Board.

Implementation

Description of concrete actions to implement anti-corruption policies, address anti-corruption risks and respond to incidents.

We are dedicating very significant resources to ensure that we do not engage in corrupt practices, including spending a lot of time and money training our employees, monitoring our compliance and selecting adequate partners. We also refrain from any business activity that does not uphold our ethical standards

Employees and selected partners are required to comply with our full suite of internal policies, including a Code of Conduct which prohibits them to offer or receive, directly or indirectly inappropriate pecuniary or other benefits. It is complimented by detailed policies and procedures, as well as a worldwide training program driven by the Compliance and Risk function. Through the policies, compliance is regularly monitored and dialogue with employees is encouraged, including through a global whistleblowing procedure, which is available not only to all employees but also to our business partners. Everybody can raise concerns and we have a dedicated email address (codeofconductconcerns@ldcom.com). This global address is completed by dedicated regional addresses to support different language requirement. In order

to ensure its independence, the whole process is controlled by the Global Compliance and Risk team and managed by the Internal Audit department.

Measurement of outcomes

Description of how the company monitors and evaluates anti-corruption performance.

We have developed various methods to ensure that employees are adequately and correctly trained for the functions they perform and also that they are aware of the legislation affecting the Group's business. In particular e-learning modules have been designed to address compliance related topics, including the Group's code of conduct, trade practice, anti-bribery and corruption rules, The Global Training department co-ordinates and presents training materials and additional guidelines as well as trading techniques and risk policies. There is an ethics-related element in the annual performance assessment and we apply a rigorous approach to monitoring our trading and accounting systems for potential improper payments.