

ACORN CAPITAL

ANTI-BRIBERY AND CORRUPTION POLICY



INNOVATION



EFFICIENCY



GROWTH



DIVERSITY



**ACORN
CAPITAL**

NEXT GENERATION INVESTING

Anti-Bribery and Corruption Policy

Bribery and corruption has the significant potential of adverse impacts to Acorn Capital (Acorn) clients, shareholders, counterparties as well as the markets and the financial services community.

Acorn may encounter a range of bribery & corruption risks that arise from its operations and dealings. Our employees and agents may face instances which expose them to bribery and corruption.

Bribery and corruption may be identified through various avenues such as daily operations, dealings, onboarding, due diligence, conflicts declarations as well as escalation matters under our whistleblower policy and process.

Why we have this policy

Although Acorn's Code of Conduct tells us of expected staff behaviours, this policy clearly outlines the scope and principles, as Acorn has a zero tolerance for bribery & corruption and is required to comply with the relevant anti-bribery and corruption laws and regulations.

Who this policy applies to

This policy applies to all Acorn staff, including subsidiaries, directors and officers. It also extends to contractors, consultants and service providers.

This policy should be read in conjunction with the following policies:

- Code of Conduct;
- Conflicts of Interest;
- Whistleblower;
- Incident Management Breach Escalation; and
- Human Resources Handbook

Policy Statement

Acorn has a zero tolerance for bribery and corruption and is committed to having processes in place to ensure that its business practices and operations are in accordance with the highest ethical and regulatory standards.

Acorn employees are all expected to comply with all applicable laws and regulations and there is an absolute prohibition from engaging in any form of bribery or corruption, be it actual or perceived.

All employees are aware of the requirements to:

- Understand and comply with this policies and any related policies, procedures or processes;
- Remain diligent in any business dealings and day to day operations;
- Report and escalate any requests, incidents, actual or suspected bribes or corruption, including any secret payments or commissions;
- Not use gifts or entertainment, political donations, or sponsorships to induce improper advantage;
- Not use employment opportunities as an inducement to act improperly to obtain or retain business, business advantages, or to influence a public official for such purposes ; and
- Report and escalate any requests for bribes.

Bribery and Corruption

Bribery means providing, offering or accepting (or causing to be provided, offered or accepted) a benefit (anything of value) to any person, including a public official or corporation, in order to improperly influence an act or decision so as to gain a business or personal benefit or advantage.

Benefits can be both financial or non-financial and direct or indirect and could be but not limited to:

- Cash or in-kind;
- Gifts or entertainment;
- Business or employment opportunities;
- Exercising powers or duties in a certain way; and
- Political or charitable or community opportunities.

Examples of Bribery include influencing trading, secret payments/commission creating or using a false document for corrupt purposes and engaging in intimidation for corruption purposes.

A bribe can be provided directly or indirectly and its irrelevant whether the bribe is successful in improperly influencing the other person or in securing a business or personal advantage. It is the intention of the person engaging in the Bribery.

In general, corruption is the misuse or abuse of a position of employment, authority or trust to gain a business or personal benefit or advantage. Corruption can be an action or requesting or inducing others to engage in corruption. It also includes making improper requests to government/public officials to breach or contravene an applicable law or regulation or exceed their scope of authority.

Providing or Receiving Gifts or Entertainment

Acorn prohibits staff from giving or accepting gifts and entertainment that are intended to, or may, improperly influence them or others, or may be perceived to be improperly influencing others.

If Staff are uncertain whether a gift or entertainment is appropriate, you should consult the Compliance Manager.

Conflicts of Interest

All employees, board and committee members are required to declare their interests.

Acorn acknowledges that there may be situations where employees, board and committee members may have actual or potential conflicts of interest. Declarations must be declared to enable Acorn to adequately manage any conflicts.

At the beginning of committee and board meetings, members are expressly asked if they have any new conflicts to declare or to update any changes to their interests. This practice helps to ensure that those in positions of influencing decisions on behalf of Acorn are not compromised to bribery and corruption.

Record Keeping

Adequate records are an important control for the prevention of bribery and corruption. Accurate, complete and accessible records of transactions, payments, registers and board and committee minutes, are maintained in accordance with Acorn's record keeping policy and the relevant laws and regulations.

No accounts can be kept 'off-book' or in any way facilitate or conceal bribery or corruption.

Reporting

Any suspected or actual incidents of bribery or corruption must be immediately reported to the Compliance Manager and the Company Secretary.

Acorn is committed in the protection of detriment to those who raise concerns in accordance with our Whistleblower Policy.

Policy Breaches

Breach of this Policy will be viewed seriously and may lead to disciplinary action being taken, criminal, civil and regulatory penalties may also apply to Acorn or its employees and directors..

Exceptions or breaches identified must be immediately reported to the Compliance Manager.

Policy Exemptions

Any requests for an exemption to this policy must be submitted to the Compliance Manager for Board approval.

Legal Obligations

If you believe you have a legal obligation that is inconsistent with this policy you should immediately report the inconsistency to the Compliance Manager and as a general rule, you should comply with the higher standard.

Policy Review

This Policy will be reviewed on a biennial basis or when there are changes to laws and regulations or significant changes to operations.

Where to Get Help

If you need more information or are unsure about how this policy operates, you should seek the assistance of the Compliance Manager.

Owner	Compliance Manager
Version	1.0
Approved	Board (July 2024)