

Circletree Enterprises Advisor Payment Policy

Policy Statement

Circletree has a zero-tolerance approach to bribery and corruption and is committed to conducting legal and ethical business operations. Any third parties that Circletree companies work with in connection with client business must be engaged in compliance with the law and on a fully transparent basis. This policy is mandatory for all Circletree companies.

Policy Applicability

This policy applies to all third parties, advisers, consultants, intermediaries or otherwise, whether corporate or individual, who offer help in any form to a Circletree company, and assistance can be direct or indirect. Examples include:

- Individuals who are working with a Circletree company pitching existing or new clients and ask for commission or a flat fee for a new business win;
- Individuals or consultancies who are providing specialist advice to clients in connection with new business;
- Consultancies or individuals offering introductions to new clients; and
- Individuals who hold themselves out as specialist government advisers who can help an agency win new work and assist by introducing government clients or government officials, all for a fee or other form of value. Examples could include flights, holidays, fully paid business trips, tickets to the Superbowl, entertaining and gifts for friends and family.

This is a non-exhaustive list. An adviser can be any proposed intermediaries or third parties who introduce new clients, aid with the retention of existing clients, make introductions to third parties who could assist with ongoing business or new business wins, or provide advice on sectors or business types.

Policy Non-Applicability

The policy is not applicable to:

- Relationships between Circletree operating companies;
- Most well-established pitch consultancies, with central Circletree new business team relationships; or
- On-site freelancers and consultants whose work is clearly visible and integrated with full time staff, remunerated at market rate without direct reference to the client revenues.

Policy

Circletree companies cannot work with advisers in connection with any government business. There are no exceptions to this policy statement. Circletree companies must ensure that they fully understand who the adviser is, background and ability to deliver legitimate services legally.

Advisor Approvals

Approval will not be granted if:

- Due diligence gives rise to any concerns about the adviser;
- There is reason to believe that the adviser might make payments or other transfers of value that are or could be construed in any way as bribes;
- There appears a risk that payments would directly or indirectly go to any current client or current client personnel;
- The client or potential client is part of, or funded by, or has links with a government body, directly or indirectly;
- The adviser has a conflict of interest with either the Circletree company or the client;
- The adviser requests payment in an unusual form, to a different organization, or to an overseas organization or bank without solidified clarification;
- The adviser is related to the client or potential client;
- Documentation does not exist which properly describes the services to be provided by the adviser and the remuneration arrangements; oral agreements are insufficient;
- It is unclear what legitimate services would be provided by the adviser;
- Payments, fees, other value, or payment terms are disproportionate to the services proposed; or
- The adviser's main location or ownership is based offshore, unless the client is in the same location or there has been sufficient clarification expressed.