



# ANTI-BRIBERY AND CORRUPTION STATEMENT

Discovery Limited and its subsidiaries are committed to upholding the highest standards of integrity and compliance with anti-bribery and corruption laws worldwide. Our zero-tolerance policy ensures that corruption, bribery, and improper advantages have no place within Discovery. Failure to address corruption risks may harm our reputation and result in legal consequences for both the company and individuals.

## Group-wide Anti-Bribery and Corruption

The Group has established a Group-wide ABC Policy and Statement that outlines the Group's approach to ensuring full compliance with all relevant anti-bribery and corruption laws in their respective jurisdictions.

## Implementation

Each entity within the Discovery Group must:

1. **Follow Applicable Legislation:** Adhere to relevant anti-bribery and corruption laws in their respective jurisdictions.
2. **Align Operations:** Implement procedures consistent with the spirit of the policy and statement.
3. **Develop Consistent Policies and Statements:** Entities may create their own anti-bribery and corruption policies and statements, provided they align with the overarching standards.

Directly held intermediate holding companies oversee adherence to the statement by their subsidiaries. In the case of South African domiciled subsidiaries directly held by Discovery Limited, the CEO of SA Inc assumes this role.

## Our Approach

We categorically reject all forms of bribery:

- **No Offering or Authorizing Bribes:** We never offer or authorize bribes, whether directly or indirectly, to public officials or private individuals.
- **No Requesting or Accepting Bribes:** We do not request or accept bribes in any form.
- **Forms of Bribes:** Bribes can be monetary or non-monetary, tangible or intangible. They may include payments, gifts, entertainment, discounts, loans, and more.

## Gifts and Entertainment

Proper management of gifts and entertainment is crucial to avoid perceived bribery or corruption. We conduct risk-based due diligence before engaging in sponsorships, charitable contributions, or community investments.



## Political Funding

We do not seek to influence the political process through improper means. Contributions to political campaigns, parties, candidates, or politically affiliated organisations strictly adhere to our Group Political Funding Policy.

## Business Partners

We expect our business partners to share our commitment to ethical and responsible business practices. To manage our bribery and corruption exposure associated with business partners, we implement controls such as screening, due diligence, and monitoring. Detailed risk-based assessments precede business partnerships to identify, assess, and mitigate corruption risks. We also include compulsory anti-corruption and bribery clauses in contractual arrangements and conduct ongoing monitoring where appropriate.

## Facilitation Payments

In certain jurisdictions, public officials may request small payments known as facilitation payments to expedite routine governmental actions (e.g., issuing permits or licenses). Facilitation payments constitute bribery. We never pay or authorize such payments. If asked to make a facilitation payment, we promptly inform the relevant Compliance function.

## Accurate Record Keeping and Financial Accounting

We ensure all transactions are accurately recorded in accordance with our procedures, reflecting their nature and substance.

## Reporting and Whistleblowing

The Group expects its directors, senior managers, employees and contractors to speak openly and raise concerns about possible non-compliance with their manager, supervisor or via other available reporting channels. We take all concerns seriously and addresses them promptly.

There are various avenues available to report a concern (as set out in the Whistleblowing Policy), including the following:

### **SOUTH AFRICA**

Discovery Group Whistleblowing Hotline Toll-free phone: 0800 00 45 00 Email: [discovery@tip-off.com](mailto:discovery@tip-off.com)

The Financial Crime Compliance Unit at [Suspicious\\_Transactions@discovery.co.za](mailto:Suspicious_Transactions@discovery.co.za)

### **UNITED KINGDOM**

Anonymous Whistleblowing Hotline Toll-free phone: 0800 333 362 Email: [whistleblowing@vitality.co.uk](mailto:whistleblowing@vitality.co.uk)

### **UNITED STATES OF AMERICA**

Email: [Whistleblowing\\_VGI@Vitalitygroup.com](mailto:Whistleblowing_VGI@Vitalitygroup.com)