



INFINITY G MARKET

GLOBAL ANTI-CORRUPTION POLICY

Introduction:

INFINITY GLOBAL MARKET LTD undertakes to comply with the strictest standards in terms of legislation and regulations relating to financial crime, in particular the detection and prevention of money laundering, the financing of terrorism, sanctions, corruption, abuse of market, fraud and data security (including identity theft) and other criminal acts (collectively referred to as 'financial crimes').

INFINITY GLOBAL MARKET LTD is committed to the implementation and application of effective anti-corruption systems by:

- Establishing a clear anti-corruption policy;
- Conducting all of its business activities with fairness, honesty, transparency and integrity;
- Carrying out an appropriate prior check of the parties having commercial relations with INFINITY GLOBAL MARKET LTD;
- Encouraging its Associates to be vigilant and to report any suspicion of corruption, as well as providing them with appropriate channels of communication to ensure that sensitive information is handled appropriately;
- Rigorously investigating cases of suspected corruption and assisting the police and other competent authorities in the event of prosecution; and
- Acting firmly and vigorously against Persons involved in corrupt activities or who do not support anti-corruption legislation.

1) Applicability:

This policy applies to all persons associated with INFINITY GLOBAL MARKET LTD (regardless of the association).

2) Corruption Offenses:

INFINITY GLOBAL MARKET LTD sets out below the various facts that may be legally qualified as a corruption offense:

a) Bribe another person

When a person offers, promises or gives a financial or other advantage to another person for the improper performance of a relevant function or activity;

b) Being corrupted by another person

When a person requests, agrees to receive or accepts a financial or other benefit, due to the improper performance of a relevant function or activity;

c) Bribery of a public official

When a person offers, promises or gives a financial or other advantage to a "public official" with the intention of influencing the official in the performance of his official duties as a public official; and

d) Inability of a business organization to prevent corruption

Where a business organization is liable to prosecution if "a person associated with it" bribes another person for the purpose of obtaining or maintaining business or a benefit in carrying on its business for the business enterprise.



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3) Compliance Obligation:

All people associated with INFINITY GLOBAL MARKET LTD are affected by:

- The prohibition of offering, promising, giving, asking, accepting or accepting to receive a bribe of any kind, in any form, directly or indirectly;
- The prohibition on making facilitation or "greasing" payments, regardless of local practices or customs;
- The prohibition of offering, promising or transferring any object of value to a foreign or national public official in order to influence the public official and to obtain or keep a market, or to obtain or keep a benefit to any associated person, including offers, promises or transfers to a third party, such as a family member, to influence a public official; and

In general, this policy prohibits anyone associated with INFINITY GLOBAL MARKET LTD from making, directly or indirectly, any payment, offer, request, acceptance or promise of anything of value to:

- Government representatives;
- Political parties or representatives of political parties;
- Candidates for political office;
- Anyone else who knows they will pass the payment, offer or promise to one of the aforementioned persons; or
- Natural or legal persons.

With or without intent to corrupt for the purpose of:

- Influence the act or decision of an official or an individual (or a legal person);
- Encourage a person to perform or omit to commit acts contrary to his official duty;
- Encourage this person to use his influence with a government to influence any decision or action of that government;
- Obtain an unfair advantage; or
- To assist in obtaining or keeping business.

INFINITY GLOBAL MARKET LTD and international anti-corruption and anti-corruption standards also prohibit aiding, encouraging or advising such prohibited payments. A corrupt act does not need to achieve its objective to be legally qualified as a corruption offense, the only intention is reprehensible.

All associated persons are required to comply with this policy and all related requirements.

Customers, natural and / or legal persons certify that they are fully aware of the anti-corruption policy and undertake to comply with it. Individuals associated with INFINITY GLOBAL MARKET LTD should also consider and comply with all applicable anti-corruption laws and regulations, including, but not limited to, those of their local jurisdiction.