



# Anti-Bribery and Corruption Policy.

2026

Money in Motion



## Policy Overview

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<b>Purpose</b>	<p>This Policy is to set out the EML Group’s commitment to conducting its business in compliance with applicable anti-bribery and anti-corruption laws and regulations and for EML Personnel to act ethically and with integrity and transparency.</p> <p>This Policy establishes a consistent global standard across the EML Group to prevent bribery and corruption, and improper influence in all business activities.</p> <p>The Policy supports the EML Group’s broader financial crime, risk management and governance frameworks.</p>
<b>Policy Objectives</b>	<p>The objective of this Policy is to:</p> <ul style="list-style-type: none"><li>• Ensure compliance with all applicable anti-bribery and corruption laws in jurisdictions in which the EML Group operates.</li><li>• Prevent bribery and corruption in connection with the EML Group’s business activities.</li><li>• Establish clear standards of behaviour to promote a culture of compliance and ethical: behaviour.</li><li>• Enable EML Personnel to understand the EML Group’s approach to preventing, detecting and responding to bribery and corruption risks.</li><li>• Establish clear record keeping, transparency and governance arrangements relating to anti-bribery and corruption.</li></ul>
<b>Policy Scope</b>	<p>This Policy applies to all legal entities within the EML Group, EML Personnel and other Third Parties acting for or on their behalf.</p> <p>This Policy applies to all business activities of the EML Group, including activities conducted outside the jurisdictions in which the EML Group has incorporated.</p>
<b>Policy Ownership</b>	<p>The Policy is owned by the Chief Risk and Compliance Officer (the “Policy Owner”) and forms part of the Risk and Compliance Policy Framework.</p>
<b>Regional Entity Addendums</b>	<p>The board of each legal entity within the EML Group has discretion to implement local appendices to this Policy setting out additional regional requirements to comply with local laws and regulations provided:</p> <ul style="list-style-type: none"><li>• They do not implement a lower standard than this Policy;</li><li>• they implement appropriate regional procedures and controls required to comply with the policy requirements set out in the local addendum; and</li><li>• prior notification of the addendum is sent to the Policy Owner and Audit and Risk Committee. The notification must set out: (a) why the regional addendum is required; (b) demonstrate the local entity's ability to comply with the requirements set out in the addendum; and (c) the impact (if any) it will have on the EML Group’s global ABC compliance framework.</li></ul> <p>Annex A identifies EML Group entities that have an approved local entity appendix to this Policy.</p>

## Policy Background

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<b>Business Summary</b>	<p>The EML Group operates a global payments and financial services business and conducts activities across multiple jurisdictions.</p> <p>Due to the nature of its operations, the EML Group may interact with customers, suppliers, business partners, agents, intermediaries and, in some circumstances, Public Officials. These activities create exposure to bribery and corruption risks if not appropriately managed.</p> <p>The EML Group recognizes that bribery and corruption can arise in many forms and is committed to conducting its business in a lawful and ethical manner, consistent with its values and applicable laws.</p>
<b>Regulatory Landscape</b>	<p>The EML Group is subject to a range of anti-bribery and anti-corruption laws and regulatory requirements in the jurisdictions in which it operates. This Policy aligns (and in some cases may exceed) the requirements of applicable anti-bribery and corruption laws and regulations in the jurisdictions in which the EML group operates, including Australia, Ireland, the United Kingdom and the United States. The policy applies a single global standard based on the most stringent legal requirements under which the EML Group must operate. This approach ensures consistent compliance across jurisdictions, supports effective risk management, and demonstrates the EML Group’s commitment to ethical conduct, transparency and regulatory compliance globally.</p> <p>Relevant regional legislative and regulatory requirements in scope of this Policy include, but are not limited to those set out in the table below.</p>

Country	Laws
<b>Australia</b>	Criminal Code Act 1995 (Cth); Crimes Legislation Amendment (Combatting Foreign Bribery) Act 2024
<b>Ireland</b>	Criminal Justice (Corruption Offences) Act 2018 (CJCOA)
<b>United Kingdom</b>	Bribery Act 2010
<b>United States</b>	Foreign Corrupt Practices Act (FCPA)

These laws generally prohibit the offering, promising, giving, requesting or accepting of bribes or other improper benefits, whether directly or indirectly, and apply to dealings with both Public Officials and private parties.

In many cases, these laws have extraterritorial application. This means they apply outside of the jurisdiction in which they were enacted if the bribery or corruption in question has a connection to that country. This means the EML group and/or EML Personnel could be in breach of these laws, even if the activity is conducted in a country that is not listed in the above table.

These laws also impose liability on individuals and organisations and employers may be held vicariously liable for the acts of their employees, agents and third parties acting on their behalf. In some jurisdictions a company is held strictly liable of an offence where an associated person engages in bribery or corruption for the benefit of the organisation, unless the organisation can demonstrate that it had implemented all reasonable steps and exercised appropriate due diligence to prevent such misconduct. Penalties may include significant fines and, for individuals, terms of imprisonment, depending on the applicable laws and regulations.

## Policy Statement

<b>Statement</b>	<p>The EML Group is committed to conducting its business honestly, ethically and with integrity, and in compliance with all applicable anti-bribery and anti-corruption laws and regulations in every jurisdiction in which it operate.</p> <p>The EML Group has zero-tolerance for all forms of (given or received) facilitation payments, bribery, or corruption in any jurisdiction, whether carried out by EML Personnel or Third Parties, regardless of whether they involve Public Officials or private parties.</p> <p>EML Personnel and Third Parties acting on EML Group’s behalf must not (directly or indirectly) offer, promise, give, request or accept bribes or other improper benefits. If they become aware of any suspected non-compliance it should be reported in accordance with this Policy.</p> <p>EML Personnel and Third Parties acting on EML Group’s behalf are required to comply with this Policy. Failure to comply with this Policy may result in disciplinary action, up to and including termination of employment or engagement, and may expose individuals and the EML Group to civil or criminal liability.</p>
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## Definitions

<b>Overview</b>	<p>The definitions set out in this Policy are intended to reflect the most stringent anti-bribery and corruption requirements in all jurisdictions in which the EML Group operates, including Australia, Ireland, the United Kingdom and the United States.</p> <p>Where definitions in local laws, regulations or regulatory guidance impose lower standards or fewer obligations, the more stringent definitions in this Policy apply.</p>
<b>EML Group</b>	Means EML Payments Limited and its direct and indirect subsidiaries and branches, regardless of whether they provide regulated services or not.
<b>EML Personnel</b>	Means all directors, officers and employees of the EML Group, including permanent, fixed-term and temporary employees, agency workers, contractors, interns, secondees, work experience students and any other persons acting for or on behalf of the EML Group, unless expressly stated otherwise.
<b>Improper Performance</b>	Means the performance or non-performance of a function, activity or decision in breach of an expectation of good faith, impartiality, integrity or trust, or in a manner inconsistent with applicable laws, regulations, professional standards or contractual obligations.

<b>Policy Owner</b>	Meaning set out in the Policy Ownership of this Policy.
<b>Public Official</b>	<p>Means any foreign or domestic:</p> <ul style="list-style-type: none"> <li>• officer, official, representative or employee of any government, government owned or controlled entity, agency, ministry, or department of a government (whether national, local or municipal), or any other entity empowered to act under any written law relating to public health, public utility, or that administers public funds (examples may include regulators, customs officials, Central Bank governors and ministers), or any person acting in an official capacity for any of the above (examples might include paid consultants to a government or public international organisation, advisors on special missions, intermediaries appointed or held out as authorised by government officials, or anyone deputised to act for a government);</li> <li>• member of a legislative body;</li> <li>• member of the judiciary;</li> <li>• political party or any official of a political party, including any candidate for political office;</li> <li>• officer or employee of a public international organization, such as the United Nations or the World Bank;</li> <li>• any individual who holds or performs the duties of an appointment, office or position created by custom or convention, including, potentially, some tribal leaders and members of royal families; or</li> <li>• immediate family member (meaning a spouse, dependent child, or household member) of any of the above.</li> </ul>
<b>Third-Party</b>	<p>Means any individual or entity (excluding EML Personnel) with whom the EML Group has or plans to enter a business relationship. A Third-Party may include, but is not limited to, persons or entities that:</p> <ul style="list-style-type: none"> <li>• provide goods or services to EML Group (e.g., contractors, external consultants, suppliers, vendors, brokers, advisers, custodians, asset managers);</li> <li>• act for or on behalf of EML Group (e.g., agents, intermediaries, introducers or representatives);</li> <li>• are customers or prospective customers of the EML Group;</li> <li>• enter or maintain a business partnership or relationship with EML Group (e.g., joint venture, partners, consortia partners or general business partners).</li> <li>• Active and passive trading in influence;</li> <li>• facilitation of an offence via gifts;</li> <li>• false documents; and,</li> <li>• intimidation.</li> </ul>

## Policy Application

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<b>Anti-Bribery and Corruption Requirements</b>	<p>Bribery involves offering, giving, promising, requesting, agreeing, receiving, accepting or soliciting any financial or other advantage, whether directly or indirectly, to or by any person (including a Public Official), with the intention of inducing, rewarding or influencing the Improper Performance of a function, activity or decision, or to obtain or retain a business, commercial, regulatory or personal advantage.</p> <p>Bribery can also occur indirectly where intermediaries, agents, family or friends are used to facilitate the bribery. For example, where an overseas representative of EML Group bribes a third party with the intention of benefitting the EML Group.</p> <p>Corruption is the abuse of entrusted power, position of employment, authority or trust to gain a business or personal benefit or advantage. Corruption can take many forms including bribery, conflicts of interest, undue influence, or requesting or causing another person (including a Public Official) to breach or contravene an applicable law or exceed their scope of authority.</p> <p>The 'advantage' offered, given or accepted may be monetary and non-monetary benefits. For example, it may involve non-cash gifts or invitations, political or charitable contributions, loans, reciprocal favours, business or employment opportunities or lavish corporate hospitality.</p> <p>EML Personnel and Third Parties to whom this Policy applies must not directly or indirectly engage in bribery or corruption in any form.</p> <p>Examples of "red flags" indicative of bribery and corruption are set out in Annexure B.</p>
<b>Gifts, Entertainment</b>	<p>EML recognises that accepting or offering gifts, entertainment or hospitality of moderate value is customary and in accordance with local business practice in some countries and regions. However, all gifts and hospitality must be reasonable and proportionate to the circumstances in which they are offered and must never be used or</p>

**and Hospitality.** perceived as an inducement to obtain improper advantage.

The practice of accepting or offering gifts, entertainment or hospitality varies between countries and regions. The utmost care must be taken to ensure that there can be no reasonable perception that the gift, entertainment or hospitality is intended to influence the relationship between EML Group and the recipient of the gift (or vice versa) in an improper or unprofessional way. If so, it must be declined.

Gifts, entertainment and hospitality must never be solicited. Where the offer, provision or acceptance of gifts, entertainment or hospitality is permitted under this Policy, utmost care must still be exercised at all times.

All gifts, entertainment and hospitality are subject to prior approval in accordance with the following approval matrix. Approvals are cumulative. For example, if you want to receive a gift of \$600 AUD, approval must be obtained from the Line Manager, Regional Head of Compliance and Regional Managing Director/CEO. If the gift was to a Public Official, you would also need the approval of the Group CEO.

Country	Gifts to Public Officials of any value	Over \$500 AUD to non-Public Official	\$5 - \$500 AUD to non-Public Official	<\$5 AUD to a non-Public Official
<b>Line Manager approval</b>	Yes	Yes	Yes	None
<b>Regional Head of Risk and Compliance approval</b>	Yes	Yes	No	None
<b>Regional Managing Director or GEO</b>	Yes	Yes	No	None
<b>Group CEO Approval</b>	Yes	No	No	None

**EML PERSONNEL MUST:**

- not make or accept gifts of cash or cash equivalents such as vouchers and gift cards;
- not make or accept gifts or arrange or attend entertainment or hospitality in circumstances that could be reasonably regarded as unduly influencing the recipient or creating a business obligation on the part of the recipient;
- not make gifts to, or arrange entertainment or hospitality for, Public Officials or Third Parties where local laws and regulations or internal policies prohibits the giving or receiving of gifts or attendance at entertainment or corporate hospitality. Further, due to special regulatory controls that often apply to Public Officials, all gifts, entertainment and hospitality involving Public Officials must be reported to and approved by the Group CEO; and
- not make gifts to, or arrange entertainment or hospitality for, a particular person so regularly or frequently as to create an impression of impropriety;
- not request a gift or entertainment or hospitality in any circumstances; or
- Get appropriate approval for all gifts and hospitality offered or received and ensure they are recorded in accordance with the record keeping requirements set out in this Policy;

<b>Facilitation Payments, Secret Commissions and Money Laundering</b>	<p>Facilitation payments and secret commissions are forms of bribery and are therefore prohibited. EML Personnel and Third Parties acting on EML Group’s behalf must report any requests for facilitation payments or secret commissions in accordance with the Reporting Breaches and Suspicious Behaviour section of this Policy.</p> <p>If EML Personnel are forced to make a facilitation payment due to immediate threats to their life or liberty and resistance is not feasible, they should immediately report this to the Policy Owner. Note this does not authorise the making of such facilitation payment nor imply that they may be made in exceptional circumstances.</p> <p><b>What are facilitation payments?</b> A facilitation payment is a payment to secure or expedite a routine government action by a government official or employee.</p> <p>Despite facilitation payments being permitted under Australian law, they are prohibited under international legislation that can have extraterritorial effect. Accordingly, such payments are prohibited under this Policy.</p> <p><b>What are secret commissions?</b> Any commission, fee, payment or other benefit offered, given or received, directly or indirectly, without the knowledge or informed consent of the principal or employer of the recipient, as an inducement to influence or reward the conduct of that principal’s business or affairs.</p> <p>An example of where secretive commission could arise is where a person or entity (such as an employee of EML Group) offers or gives a commission to an agent or representative of another person (such as a customer of EML) that is not disclosed by that agent or representative. Such a payment is made as an inducement to influence the conduct of the principal of the agent in their business.</p> <p><b>What is money laundering?</b> Any act or process by which the existence, source, movement or ownership of the proceeds of crime is concealed, disguised or converted so that such proceeds appear to have a legitimate origin, including actions intended to assist any person to evade detection, investigation or prosecution.</p> <p>The EML Group has separate Anti-Money Laundering (AML) and Counter-Terrorism Financing (CTF) programs which must be adhered to by EML Personnel.</p>
<b>Political and Charitable Donations</b>	<p>No donation or other financial contribution, whether to a charity, political party, candidate for an election, or a recipient which is controlled by, or wholly or partly owned by, a government organisation or official, may be made using company funds without EML Group Board approval.</p>
<b>Third Parties</b>	<p>Bribery and corruption risks may arise through the actions of Third Parties acting on behalf of the EML Group.</p> <p>EML Personnel and Third Parties acting on EML Group’s behalf must not engage Third Parties, or continue relationships with Third Parties, where there is a reasonable belief that the Third Party may engage in bribery or corruption in connection with the EML Group’s business.</p>
<b>Employment and Other Benefits</b>	<p>EML Personnel and Third Parties acting on EML Group’s behalf must not offer or provide employment, internships or other benefits where such offers could reasonably be perceived as an improper inducement or advantage.</p>
<b>Record Keeping</b>	<p>All transactions must be accurately and completely recorded in the EML Group’s books and records and maintained to a standard that supports effective investigation and regulatory reporting. In some jurisdictions, withholding or failing to disclose information may itself constitute an offence, particularly where laws require individuals or organisations to provide information that could assist in the prevention, detection, or prosecution of certain offences.</p> <p>EML Personnel and Third-Parties acting on behalf of the EML Group must not create or maintain false, misleading or incomplete records for any purpose.</p>
<b>Consequences of a Breach</b>	<p>A breach of this policy by EML Personnel and Third Parties acting on EML Group’s behalf may be regarded as serious misconduct leading to disciplinary action, which may include termination of contract. Conduct in breach of this Policy may also expose an individual and/or the EML Group to criminal or civil liability and could result in imprisonment or a significant financial penalty.</p> <p>Where a bribery or corruption offence is committed with the consent or enablement of a director or officer, or is attributable to their neglect, that individual may be subject to disciplinary action and may also incur personal civil or criminal liability under applicable laws.</p>

## Policy Implementation

<b>Adequate Procedures</b>	<p>The EML Group must maintain adequate procedures designed to prevent bribery and corruption. These procedures must be proportionate to the EML Group’s bribery and corruption risks. Adequate procedures are implemented through EML Group’s systems and controls, including:</p> <ul style="list-style-type: none"> <li>• Global and regional financial crime frameworks;</li> <li>• EML Group Risk Management Framework;</li> <li>• EML Code of Conduct;</li> <li>• Screening of EML Personnel;</li> <li>• Supplier Code of Conduct;</li> <li>• Global Travel and Expenses Policy;</li> <li>• Whistleblower Policy; and</li> <li>• record keeping and the maintenance of gifts and entertainment registers.</li> </ul> <p>In some jurisdictions to rely on a statutory defence EML must demonstrate it took all reasonable steps and exercised all due diligence to avoid the commission of an offence. This policies systems and controls form the core of that defence.</p>
<b>Risk Management</b>	<p>The EML Group must conduct risk assessments to identify and evaluate potential bribery and corruption risks associated with its operations, business relationships and geographic locations. The EML Group /must have methodologies and conduct periodic risk assessments to manage and treat bribery and corruption risk arising from its business activities. Risk assessments should be informed by the services provided by the EML Group, the jurisdictions in which we operate and the nature of our third-party business arrangements.</p> <p>Further information on the EML Groups approach to managing bribery and corruption risks is set out in the Group Risk Management Framework.</p>
<b>Reporting Breaches and Suspicious Behaviour</b>	<p>EML Personnel must report any suspected breaches of, or suspicious conduct in relation to, this Policy. This includes behaviour that makes EML Personnel and others engaged in activities for EML Group feel threatened or under pressure to act in a way they feel is inconsistent with this Policy.</p> <p>Reports should be made in accordance with EML’s Whistleblower Policy which affords all EML Personnel with protections against reprisal, harassment or demotion for making a report.</p>

## Role and Responsibilities

<b>Group Board</b>	<p>The EML Group Board has ultimate responsibility for oversight of the EML Group’s approach to managing bribery and corruption risk.</p> <p>The EML Group Board may delegate specific oversight responsibilities to Board Committees to perform, subject to them being recorded in the committee’s Terms of Reference.</p>
<b>Audit and Risk Committee</b>	<p>Annual review and approval of this Policy and monitoring of ABC risks and issues across the EML Group.</p>
<b>Regional Boards</b>	<p>Ensuring compliance with regional anti-bribery and corruption requirements and managing associated risks within their region.</p> <p>Regional boards may delegate specific oversight responsibilities to local Board Committees to perform, subject to them being recorded in the committee’s Terms of Reference.</p>
<b>Regional Risk and Compliance team</b>	<p>Ensuring appropriate second line oversight arrangements (regional or global) are in place for each legal entity within their region. The Head or Regional Risk and Compliance for each region is also responsible for local board and committee reporting within their region.</p>
<b>Global Compliance team</b>	<p>Designing and maintaining EML Group’s global anti-bribery and corruption compliance framework, including second line monitoring and testing of the implementation of this Policy, Group level internal reporting to the Chief Risk and Compliance Officer and global training and awareness.</p>
<b>Global Risk</b>	<p>Ensuring the EML Group risk management framework adequately captures, manages and mitigates bribery and corruption risks.</p>
<b>Internal audit</b>	<p>Ensuring anti-bribery and corruption risks are captured in testing and reporting plan.</p>

<b>Directors and Senior Managers</b>	Directors and senior officers of the EML Group must take reasonable steps to prevent bribery and corruption within the areas of the business for which they are responsible. They are expected to proactively promote a culture of ethical conduct, compliance with this Policy, and effective oversight of bribery and corruption risks.
<b>All applicable persons</b>	<p>All persons to which this Policy applies are required to:</p> <ul style="list-style-type: none"> <li>• Comply with this Policy and applicable laws and regulations.</li> <li>• Complete assigned training on time</li> <li>• Follow the implementation procedures associated with this Policy</li> </ul> <p>Report any suspected breaches of this policy</p>

## Governance and Oversight

<b>Overview</b>	The EML Group is committed to maintaining appropriate governance arrangements to support compliance with this Policy and with applicable anti-bribery and anti-corruption laws and regulations.
<b>Monitoring and Reporting</b>	<p>Anti-bribery and corruption is in scope of second line and third line monitoring and testing to provide assurance to applicable boards and committees.</p> <p>Horizon scanning is conducted in all countries in which the EML Group is regulated. Any material changes to applicable anti-bribery and corruptions laws, regulations or guidance will be reported to the applicable regional and global committees and boards in accordance with internal reporting requirements.</p>
<b>Training and Awareness</b>	<p>EML Group will provide training to EML Personnel, to the extent applicable to their roles:</p> <ul style="list-style-type: none"> <li>• as part of their induction process; and</li> <li>• on annual basis thereafter.</li> </ul> <p>All Third Parties engaged by the EML Group are required to provide training to their own personnel and operate anti-bribery and corruption policies and procedures in accordance with applicable laws and regulations to their business.</p>
<b>Policy Review, Approval and Change Management</b>	<p>The Audit and Risk Committee will review this policy annually or as required to:</p> <ul style="list-style-type: none"> <li>• Comply with changes to applicable laws and regulations;</li> <li>• respond to emerging risks; or</li> <li>• ensure reports pursuant to, or breaches of, this Policy are appropriately recorded, investigated and responded to.</li> </ul> <p>Any material changes to this Policy are subject to approval by the Audit and Risk Committee.</p>

## Policy Governance

<b>Approver</b>	Audit and Risk Committee
<b>Exemption Authority</b>	EML Payments Chief Risk & Compliance Officer
<b>Owner</b>	EML Payments Chief Risk & Compliance Officer
<b>Review Cycle</b>	Annual
<b>Next Review Date</b>	February 2027
<b>Document Classification</b>	Policy – Internal

## Material Revisions

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Version	Approval Date	Effective Date	Details
01	18/08/2020	18/08/2020	First global policy
02	21/08/2022	21/08/2022	Review
03	25/11/2024	25/11/2024	Changes include:
04	03/02/2026	23/02/2026	<ul style="list-style-type: none"><li>• Reformatted to the new policy template.</li><li>• Amended approval requirements for gifts, entertainment and hospitality.</li><li>• Incorporation of additional regional requirements with a view to superseding remaining regional policies.</li><li>• Inclusion of a process for subsidiaries to create a regional addendum to this policy if required.</li></ul>

## **Annexure A - Entity-Specific Anti-Bribery and Corruption Policies.**

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### **Overview**

No regional addendums were in place at the time of the 2026 policy review.

Any existing regional policies in place at the time of this review will be superseded by this Policy. Regional boards may opt to create regional addendums to this Policy if required as a result.

## Annexure B – Potential Risk Scenarios – Bribery and Corruption

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**Risk Scenarios** The following is a list of bribery and corruption “red flags” that may arise during the course of working for or providing services to the Group. The list is for illustrative purposes only and is not intended to be exhaustive. If you encounter any of the following, you must report them promptly in accordance with the Reporting Breaches and Suspicious Behaviour section of this policy.

1. You learn that a Third Party engages in, or has been accused of engaging in, improper business practices.
2. You learn that a Third Party has a reputation for paying bribes or requiring that bribes are paid to them.
3. A Third party insists on receiving a commission or fee payment before committing to sign up to a contract with the EML Group or carrying out a government function or process for the EML Group.
4. A Third-Party requests payment in cash and/or refuses to sign a formal commission or fee agreement, or to provide an invoice or receipt for a payment made.
5. A Third-Party requests that payment is made to a country or geographic location different to where the Third Party resides or conducts business.
6. A Third-Party requests an unexpected additional fee or commission to ‘facilitate’ a service.
7. A Third-Party demands entertainment or gifts before commencing or continuing contractual negotiations or provision of services.
8. You learn that a colleague has been taking out a particular supplier for very expensive and frequent meals.
9. A Third-Party requests that payment is made to ‘overlook’ potential legal violations.
10. A Third-Party requests that an EML Group company provide employment or some other advantage to a friend or relative.
11. You receive an invoice from a Third Party that appears to be non-standard or customised.
12. A third party insists on the use of side letters or refuses to put terms agreed in writing.
13. You notice that the EML Group has been invoiced for a commission or fee payment that appears large given the service stated to have been provided.
14. A Third-Party requests or requires the use of an agent, intermediary, consultant, distributor or supplier that is not typically used or known by the EML Group company concerned.
15. You are offered an unusually generous gift or offered lavish hospitality by a third party.