



CENTENNIAL BERMUDA FOUNDATION COMPLIANCE POLICY

Guiding Principles

Centennial Bermuda Foundation (“Centennial”) is dedicated to conducting its affairs with integrity, honesty and in compliance with Bermuda’s laws, particularly its Criminal Code and its anti- money laundering and anti-terrorism financing legislation (“Bermuda’s Compliance Legislation”).

Contracts with service providers, particularly financial institutions, impose strict obligations upon their clients to satisfy themselves that their business, Directors, employees and agents are not engaged in acts of corruption, extortion, bribery, fraud, money laundering, terrorist financing, terrorism and other acts of criminal conduct in or outside of Bermuda (“Prohibited Activities”). Centennial is party to such contracts and it takes its obligations seriously.

To ensure and to monitor compliance, there is a high expectation that all Directors, Committee members, employees and consultants of Centennial will:

- Comply at all times with Bermuda’s Compliance Legislation;
- Not Engage in any of the Prohibited Activities;
- Promptly report in writing to the Managing Director or Secretary of Centennial any circumstance where he or she could be or has been accused of contravening Bermuda’s Compliance Legislation or engaging in any of the Prohibited Activities.
- Promptly report in writing to the Managing Director or the Secretary of Centennial any circumstance where he or she suspects that a Director, Committee member, employee, consultant or agent of Centennial is or has been engaged in any activity or conduct that contravenes Bermuda’s Compliance Legislation or is or has been engaged in Prohibited Activities.
- Promptly report in writing to the Managing Director or the Secretary of Centennial any circumstance where he or she suspects that a potential recipient of Centennial’s funds or a recipient of Centennial’s funds is or has been engaged in any activity or conduct that contravenes Bermuda’s Compliance Legislation or is or has been engaged in Prohibited Activities.
- Provide upon request of Centennial compliance information including certified copies of identification documents such as driver’s license, passport, utility bills, citizenship and tax status.

Centennial undertakes to treat any written reports or compliance information received in strict confidence save for any legal obligation to provide disclosure of the written report to an authority, or any request by Centennial’s auditors, licensed service providers or regulatory authorities for compliance information.

As part of Centennial’s Compliance Policy, Directors, Committee members, employees and consultants are required annually to complete and return the attached Compliance Declaration.

CENTENNIAL BERMUDA FOUNDATION COMPLAINT DECLARATION

TO: THE NOMINATIONS AND GOVERNANCE COMMITTEE (“the Committee”) TO THE ATTENTION OF TERRÉ SMITH, PROGRAMME & OPERATIONS TO CENTENNIAL BERMUDA FOUNDATION

I DECLARE to the best of my knowledge and belief that:

1. I have not contravened Bermuda’s Compliance Legislation or engaged in Prohibited Activities as defined by Centennial’s Compliance Policy;
2. I understand and agree that if I become aware of any circumstance that raises a suspicion that any Director, Committee member, employee, consultant or agent of Centennial or any potential recipient or recipient of Centennial’s funds has contravened Bermuda’s Compliance Legislation or engaged in Prohibited Activities that I will provide a written report in accordance with Centennial’s Compliance Policy.

I acknowledge and agree that I shall promptly inform the Committee by email of any change in any matter contained in this Declaration and that I shall once a year upon request complete a new Declaration. I confirm that I have read and understood Centennial’s Compliance Policy and will abide by its terms.