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ETHIC Intelligence

Decision of Award and Registration ISO 37001

Awarded to
CPA GLOBAL

5 July 2017

Philippe MONTIGNY

President

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CERTIFYING EXCELLENCE IN ANTI-CORRUPTION COMPLIANCE

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ETHIC Intelligence, certification body, according to the ISO 17021.9 standard “requirements for certification bodies” has asked:

The ISO 37001 Technical Committee,

To complete the examination of the findings presented by the Lead Auditor Jean-Christophe Carrau and the corrective action plans for the Four Minor Non-Conformities found during the ISO 37001 audit presented by Mark Speck, Chief Compliance Officer of CPA Global.

ETHIC Intelligence,

- **Taking into account** the letter signed by CPA Global’s CEO stating his intent to submit CPA Global’s Anti-Bribery Management System to an ISO 37001 certification audit (Annex 1);
- **having taken note** of the audit report and findings presented by the Lead Auditor Mr Jean-Christophe Carrau;
- **noting** that the corrective action plans for the Four Minor Non-Conformities found during the ISO 37001 audit are rigorous and appropriate to the structure of the organization;
- **having concluded**, after the ISO 37001 Technical Committee review that the Anti-Bribery Management System is in compliance with the ISO 37001:2016 standard;
- **Supports** the overall evaluation reached by the Lead Auditor, namely that ETHIC Intelligence agrees on the ISO 37001:2016 certification of CPA Global;

AWARDS, on this day and for a duration of three years (3), **ISO 37001 Certification** to CPA Global (Parent company: Redhop Holdings Limited. Company number 109842) in virtue of having implemented an Anti-Bribery Management System which conforms to the standard.

Paris, 5 July 2017

President of ETHIC Intelligence

A handwritten signature in black ink, appearing to read "Ph. Montigny".

Philippe Montigny

ANNEX 1: LETTER OF INTENT

CPA GLOBAL®

Philippe Montigny
ETHIC Intelligence President
ETHIC Intelligence
10, rue Pergolèse
75116 Paris – France

April 20, 2017

Dear Sir,

I undersigned, Simon Webster, Chief Executive Officer of CPA Global, hereby confirm my intent to have CPA Global's Anti-Bribery Management System evaluated by ETHIC Intelligence accredited auditors in view of obtaining an ISO 37001 certification.

I wish that the following be examined in particular:

- The way our compliance program is designed with respect to international best practices;
- The implementation of this compliance program within CPA Global's operations with respect to international best practices.

I wish that the following be examined according to the requirements of the ISO 37001, and in particular:

- The design of our anti-bribery management system;
- The implementation of this management system within CPA Global's operations.

For the purposes of this certification process, I request that: Mr. Mark Speck, CPA Global's Chief Compliance Officer:

- Provide auditors with all relevant data and information;
- Grant auditors access, in the best of terms, to all files they should wish to consult;
- Arrange meetings between the auditors and any CPA Global employees and persons working on CPA Global's account that the auditors wish to interview.

I acknowledge that I am obliged to review all information contained in the Certification File drafted by the auditor and that said Certification File will be transmitted to you only if the information it contains is complete and accurate.

Sincerely,



CEO, CPA Global

ANNEX 2: AUDIT INFORMATION

The on-site audit began on May 15, 2017 at the head offices of CPA Global, in Jersey. The audit also covered the London Office and Alexandria Office. The audit was concluded on May 23, 2017.

The audit was based on documented information review as well as interviews with executives. Documents analyzed were either made available spontaneously by the interviewees or were requested by the Auditors.

AUDIT OBJECTIVE

The audit objective was to determine if CPA Global has implemented an Anti-Bribery Management System that could prevent, detect and mitigate the risk of bribery.

AUDIT CRITERIA

The audit criteria were:

- The requirements of ISO 37001 standard
- Applicable laws
- CPA internal policies and procedures relative to the ISO 37001 Management System

AUDIT SCOPE

The audit scope covers CPA Global Group, meaning the Intellectual Property activities, software and services.