



## ANTI BRIBERY AND CORRUPTION POLICY

### 1. Introduction

- 1.1 Bribery and corruption remain a major issue in world trade, despite the many dedicated efforts to prevent them. Our legal obligations are primarily governed by the Bribery Act 2010. That Act affects us, as a UK company, if bribery occurs anywhere in our business.
- 1.2 Involvement in bribery and corruption exposes the Company and relevant individuals to a criminal offence. It will also damage our reputation and the confidence of our clients, suppliers and business partners.
- 1.3 The Company's position is simple: the Company conducts its business to the highest legal and ethical standards. The Company will not be party to corruption or bribery in any form. Such acts would damage the Company's reputation and expose the Company, and its employees and representatives, to the risk of fines and imprisonment.
- 1.4 We run our business with integrity and in an honest and ethical manner. All of us must work together to ensure that our business remains untainted by bribery or corruption. This policy is a crucial element of that effort and is the personal responsibility of the Chief Executive Officer it has the full support of the Company's board, and it is *the* Chief Executive Officer's commitment to make sure it is followed. However, the policy needs the full support of you, our staff, to make it work.
- 1.5 This policy sets out the steps all of us must take to prevent bribery and corruption in the Company's business in order to comply with relevant legislation and the Company's requirements.

### 2. What are Bribery and Corruption?

- 2.1 A '**bribe**' is a financial or other advantage offered, promised, requested or given to induce a person to perform a relevant function or activity improperly, or to reward them for doing so. In this context, a 'financial or other advantage' is likely to include cash or cash equivalent, gifts, hospitality and entertainment, services, loans, preferential treatment in a tendering process, discounts etc. The timing of the bribe is irrelevant and payments made after the relevant event will still be caught, as will bribes that are given or received unknowingly. It is not necessary for the individual or organisation actually to receive any benefit as a result of the bribe.
- 2.2 '**Bribery**' includes offering, promising, giving, accepting or seeking a bribe.
- 2.3 '**Corruption**' is the misuse of office or power for private gain.
- 2.4 All forms of bribery and corruption are strictly prohibited. If you are unsure about whether a particular act constitutes bribery, you should raise it with your manager.
- 2.5 This means that no person must:
  - 2.5.1 give or offer any payment, gift, hospitality or other benefit in the expectation that a business advantage will be received, or to reward any business received;
  - 2.5.2 accept any offer from a third party that you know or suspect is made with the expectation that we will provide a business advantage for them or anyone else; and/or
  - 2.5.3 give or offer any payment (sometimes known as a 'facilitation payment') to a government official in any country to facilitate or speed up a routine or necessary procedure.
- 2.6 No person must threaten or retaliate against another person who has refused to offer or accept a bribe or who has raised concerns about possible bribery or corruption.
- 2.7 It does not matter whether the bribery occurs in the UK or abroad. A corrupt act committed abroad may well result in a prosecution in the UK. Nor does it matter whether the act is done directly or indirectly.



**3. Who can be involved in Bribery and in what circumstances?**

- 3.1 Bribery and corruption may be committed by anyone working for us or on behalf in any capacity, such as our employees, officers or directors, anyone they authorise to do things on their behalf, our representatives and other third parties who act on our behalf, our suppliers and even our customers.
- 3.2 The provisions of this policy therefore apply to all those listed in paragraph 1 above.
- 3.3 Bribery can occur in both the public and private sectors. The person receiving the bribe is usually in a position to influence the award or the progress of business, often a government or other public official.

**4. The legal position on Bribery and Corruption?**

- 4.1 Bribery and corruption are criminal offences in most countries where we do business. UK-incorporated companies, including us, are subject to the Bribery Act 2010.

**5. Who is responsible for this Policy?**

- 5.1 The Chief Executive Officer has overall responsibility for this policy.

Signature... *Stuart Wiltshire*..... 12 November 2024

**Stuart Wiltshire**

**Chief Executive Officer**