



## **Bribery and Corruption Policy**

### **Introduction:**

Our company is committed to conducting its business in an ethical and lawful manner. Bribery and corruption are criminal offenses that can damage our reputation, harm our relationships with clients and suppliers, and result in legal and financial penalties. This policy outlines our company's zero-tolerance approach to bribery and corruption and provides guidance on how to avoid these practices.

### **Scope:**

This policy applies to all employees, directors, officers, agents, contractors, and other persons working on behalf of our company, whether located in the UK or overseas.

### **Policy:**

**Prohibition on bribery and corruption:** Our company prohibits bribery and corruption in all its forms, whether involving public officials, private individuals, or other organizations. This prohibition applies to all activities related to our business, including but not limited to sales, marketing, purchasing, and other transactions.

**Compliance with laws and regulations:** Our company is committed to complying with all applicable laws and regulations related to bribery and corruption, including the UK Bribery Act 2010, the US Foreign Corrupt Practices Act, and other local laws and regulations.

**Gifts, hospitality, and expenses:** Our company recognizes that the provision and receipt of gifts, hospitality, and expenses can create risks of bribery and corruption. Therefore, we require all employees to obtain prior approval before providing or accepting any gifts, hospitality, or expenses that exceed reasonable and proportionate limits.

**Due diligence on third parties:** Our company conducts due diligence on all third parties with whom we do business, including suppliers, agents, distributors, and other intermediaries, to ensure that they comply with our anti-bribery and corruption policy and relevant laws and regulations.

**Reporting and investigation of suspected bribery and corruption:** Our company encourages all employees to report any suspected or actual bribery or corruption immediately to their manager, a member of the compliance team, or through the company's whistleblowing channels. All reports will be treated confidentially and investigated promptly and thoroughly.

**Consequences of non-compliance:** Breach of this policy may result in disciplinary action, up to and including dismissal. Our company reserves the right to terminate contracts and business relationships with any third party that engages in bribery or corruption.

### **Training and Communication:**

Our company provides regular training and communication to employees and other persons working on our behalf to raise awareness of our anti-bribery and corruption policy and how to avoid these practices.



**Review and Monitoring:**

Our company reviews and monitors our anti-bribery and corruption policy regularly to ensure that it remains effective and up-to-date with changes in laws and regulations.