



Bribery and Corruption Policy

Department: Human Resources

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Bribery and Corruption Policy

- (a) The Company is fundamentally opposed to any acts of bribery and to the making of facilitation payments as defined by the Bribery Act 2010.
- (b) Employees and any other persons associated with the Company such as agents, subsidiaries and business partners are not permitted to either offer or receive any type of bribe and/or facilitation payment.
- (c) All employees are encouraged to report any suspicion of corruption or bribery within the Company in accordance with the Whistleblowing Policy.
- (d) Should any employee or associated person be in doubt when receiving or issuing gifts and hospitality they must refer the issue to senior management.
- (e) The Company uses its reasonable endeavors to implement the guidance principles on bribery management that are published, from time to time, by Secretary of State in accordance with Section 9 of the Bribery Act 2010.
- (f) If an employee or associated person is found guilty of giving or receiving a bribe, he/she will be personally criminally liable and may be subject to disciplinary action.
- (g) Anyone found guilty of bribery, will be responsible for bearing any related remedial costs such as losses, court fees or expenses.

