

## Anti-Bribery Policy

The Company is committed to applying the highest standards of ethical conduct and integrity in its business activities in the UK and overseas. Every employee and individual acting on the organisation's behalf is responsible for maintaining the organisation's reputation and for conducting company business honestly and professionally.

The Company considers that bribery and corruption has a detrimental impact on business by undermining good governance and distorting free markets.

The Company benefits from carrying out business in a transparent and ethical way and helping to ensure that there is honest, open and fair competition in all matters. Where there is a level playing field, the Company can lead the market through being creative and innovative in key business activities that differentiate the Company from competitors and by delivering excellent services to its stakeholders.

Transparent, fair conduct helps to foster deeper relationships of trust between the Company and its business partners and stakeholders. It is vital for the Company's reputation and future growth.

The Company does not tolerate any form of bribery, whether direct or indirect, by, or of, its employees, officers, agents or consultants or any persons or companies acting for it or on its behalf. The board and senior management are committed to implementing and enforcing effective systems throughout the Company to prevent, monitor and eliminate bribery, in accordance with the Bribery Act 2010.

This anti-bribery policy (which forms part of your Contract of Employment) outlines the organisation's position on preventing and prohibiting bribery.. The anti-bribery policy applies to all employees, including those of any subsidiary] as well as agency workers, consultants and contractors All employees and other individuals acting for the Company are required to familiarise themselves and comply with the organisation's anti-bribery policy with immediate effect.

A bribe is a financial advantage or other reward that is offered to, given to, or received by an individual or company (whether directly or indirectly) to induce or influence that individual or company to perform public or corporate functions or duties improperly.

Employees and others acting for or on behalf of the Company are strictly prohibited from making, soliciting or receiving any bribes or unauthorised payments.

As part of its anti-bribery measures, the Company is committed to transparent, proportionate, reasonable and bona fide hospitality and promotional expenditure. Such expenditure must be authorised in advance, in accordance with the procedures set out in the organisation's [anti-bribery policy].

A breach of the organisation's anti-bribery policy by an employee will be treated as grounds for disciplinary action, which may result in a finding of gross misconduct, and immediate dismissal. Employees and other individuals acting for the Company should note that bribery is a criminal offence that may result in up to 10 years' imprisonment and/or an unlimited fine for the individual and an unlimited fine for the organisation.

The Company will not conduct business with service providers, agents or representatives that do not support the organisation's anti-bribery objectives. The Company reserves the right to terminate its contractual arrangements with any third parties acting for, or on behalf of, the

Company with immediate effect where there is evidence that they have committed acts of bribery.

The success of the organisation's anti-bribery measures depends on all employees, and those acting for the organisation, playing their part in helping to detect and eradicate bribery. Therefore, all employees and others acting for, or on behalf of, the Company are encouraged to report any suspected bribery in accordance with the procedures set out in the anti-bribery policy. The Company will support any individuals who make such a report, provided that it is made in good faith.

**This Anti Bribery policy is not contractual and may be varied by the organisation at any time**