

## **Bribery Policy**

Whilst engaged on the business of the Company, all employees are expressly prohibited from offering, promising or giving a bribe or requesting, agreeing to receive, or accepting a bribe. Bribery is a criminal offence under the Bribery Act 2010, and it will not be tolerated under any circumstances.

Breach of this provision constitutes a gross misconduct offence.

During any period of employment, all employees shall also:

- take all necessary steps to avoid conflicts of interest and to report to the Company any possible conflict of interest
- immediately disclose to the Company any knowledge or suspicion they may have that they, or any other employee or officer of the Company, has plans to commit a serious breach of duty or serious wrongdoing, or that they are not observing rules or procedures for the proper conduct of the Company's business and for the avoidance of doubt this includes reporting their own wrongdoing
- immediately disclose to the Company any knowledge or suspicion they may have that any other employee, officer or agent of the Company, has plans to offer, promise or give a bribe or to request, agree to receive or accept a bribe or to bribe a foreign public official in connection with the business of the Company contrary to the Bribery Act 2010 and for the avoidance of doubt this includes reporting their own wrongdoing. Such disclosures can be made under the terms of the Company's disclosures in the public interest policy report to the Company any direct or indirect approaches that are made to any employee by any business that may be in direct or indirect competition with the Company's business