



## Group Policies

### Anti-Bribery Policy Statement

We value our reputation for ethical behaviour and in accordance with our Policy on Business Behaviour and Practices we are committed to carrying out our business activities in a fair, open and honest manner.

In addition to our commitment to comply with all legislative and regulatory requirements that impact on our business activities we also recognise that any involvement in bribery will also reflect adversely on our image and reputation. It is our aim therefore to limit our exposure to bribery by:

- Setting out a clear anti-bribery policy.
- Ensuring our employees can recognise and avoid the use of bribery by themselves and others.
- Encouraging our employees to be vigilant and to report any suspicion of bribery.
- Rigorously investigating instances of alleged bribery and assist the police and any other authorities in any resulting investigations.
- Taking firm and appropriate action against anyone involved in bribery.

### The Policy

The Company prohibits:-

- The offering, giving, solicitation or acceptance of any bribe, whether cash or other inducement to or from any person or company, wherever they are situated and whether or not they are a public official or body or private person or company.
- By any individual employee, agent or other person or body acting on the Group's behalf.
- In order to gain any commercial, contractual or regulatory advantage for the Group which is in any way unethical or in order to gain any personal advantage, pecuniary or otherwise, for the individual or anyone connected with the individual.
- Any proven act of bribery by any employee will be considered to constitute gross misconduct will be dealt with in accordance with our disciplinary procedures.

### Further Clarification

Whilst the majority of our business operations are undertaken within the UK we recognise that market practice varies across different territories and what is normal and acceptable in one place may not be in another

Therefore, this policy covers all of our operations in any territory and prohibits any inducement which results in personal gain or advantage to the recipient or any person or body associated with them or advantage to the recipient or any person or body associated with them, and which is intended to influence them to take action which may not be solely in the interest of the Group or of the person or body employing them or whom they represent.



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This policy is not meant to prohibit the following practices providing that they are proportionate and properly recorded:

- Normal and appropriate hospitality
- The giving of a ceremonial gift on a festival or at another special time
- The use of any recognised fast-track process which is available to all on payment of a fee
- The offer of resources to assist the person or body to make a decision more efficiently provided that they are supplied for that purpose only.

Inevitably, decisions as to what is acceptable may not always be easy. If anyone is in doubt as to whether a potential act constitutes bribery, the matter should be referred to your Line Manager and/or the Human Resources Manager before proceeding.

Any hospitality or significant gifts received or provided by employees should be reported to the Human Resources Manager to be recorded on the Hospitality Register.

### Employee Responsibility

The prevention, detection and reporting of bribery is the responsibility of all employees throughout the Group. Employees should report any concerns, suspicions, or actual acts of non-compliance with this policy bribery to the Human Resources Manager and any investigations will be conducted in a confidential and appropriate manner.

M Smith  
Group Chief Executive Officer

Date: January 2026  
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