

## Anti-Bribery Policy

This Policy applies to all employees, agents, contractors, subcontractors, consultants, business partners and any other parties (including individuals, partnerships and bodies corporate) associated with the Company or any of its subsidiaries.

It is the responsibility of all the above-mentioned parties to ensure that bribery is prevented, detected and reported and all such reports should be made in accordance with the Company's Whistleblowing Policy or as otherwise stated in this Policy, as appropriate.

No above-mentioned party described may:

give or promise any financial or other advantage to another party (or use a third party to do the same) on the Company's behalf where that advantage is intended to induce the other party to perform a particular function improperly, to reward them for the same, or where the acceptance of that advantage will in itself constitute improper conduct; request or agree to receive any financial or other advantage from another party where that advantage is intended to induce the improper performance of a particular function, where the acceptance of that advantage will in itself constitute improper conduct, or where the recipient intends to act improperly in anticipation of such an advantage.

Above mentioned parties must:

be aware and alert always of all bribery risks as described in this Policy and in particular as set out in the due diligence and risk section below; they should exercise due diligence at all times when dealing with third parties on behalf of the Company; and report any and all concerns relating to bribery to a Company Director or, in the case of non-employees, their normal point of contact within the Company, or otherwise in accordance with the Company's Whistleblowing Policy.

### Facilitation Payments

A facilitation payment is defined as a small payment made to officials in order to ensure or speed up the performance of routine or necessary functions.

Facilitation payments constitute bribes and, subject to the paragraph below may not be made at any time irrespective of prevailing business customs in certain territories.

Facilitation or similar payments may be made in limited circumstances where your life is in danger but under no other circumstances. Any payment so made must be reported The Managing Director as soon as is reasonably possible and practicable.

### Gifts and Hospitality

Gifts and hospitality remain a legitimate part of conducting business and should be provided only in compliance with the Company's Gifts and Hospitality Policy.

Gifts and hospitality can, when excessive, constitute a bribe and/or a conflict of interest. Care and due diligence should be exercised at all times when giving or receiving any form of gift or hospitality on behalf of the Company.

The following general principles apply:

Gifts and hospitality may neither be given nor received as rewards, inducements or encouragement for preferential treatment or inappropriate or dishonest conduct.

Neither gifts nor hospitality should be actively sought or encouraged from any party, nor should the impression be given that the award of any business, custom, contract or similar will be in any way conditional on gifts or hospitality.

Cash should be neither given nor received as a gift under any circumstances.

Gifts and hospitality to or from relevant parties should be generally avoided at the time of contracts being tendered or awarded.

The value of all gifts and hospitality, whether given or received, should be proportionate to the matter to which they relate and should not be unusually high or generous when compared to prevailing practices in our industry or sector.

Certain gifts which would otherwise be in breach of this Policy and/or the Hospitality and Gifts Policy may be accepted if refusal would cause significant and/or cultural offence, however the Company will donate any gifts accepted for such reasons to a charity of the Managing Director's choosing.

All gifts and hospitality, whether given or received, must be recorded in the Hospitality & Gifts Register.

### **Charitable Donations**

Charitable donations are permitted only to registered (non-profit) charities. No charitable donations may be given to any organisation which is not a registered charity. All charitable donations must be fully recorded by the Accounts Manager. Proof of receipt of all charitable donations must be obtained from the recipient organisation.

Under no circumstances may charitable donations be made in cash. No charitable donation may be made at the request of any party where that donation may result in improper conduct.

### **Political Donations**

The Company does not make political donations and the Company is not affiliated with any political party, independent candidate, or with any other organisation whose activities are primarily political.

Employees and other associated parties are free to make personal donations provided such payments are not purported to be made on behalf of the Company and are not made to obtain any form of advantage in any business transaction.

### **Due Diligence and Risks**

The following issues should be considered with care in any and all transactions, dealings with officials, and other business matters concerning third parties:

Territorial risks, particularly the prevalence of bribery and corruption in a particular country;

Cross-border payments, particularly those involving territories falling under territorial risks as above.

Requests for cash payment, payment through intermediaries or other unusual methods of payment;

Activities requiring the Company and / or any associated party to obtain permits or other forms of official authorisation;

Transactions involving the import or export of goods.

Signed:-

A handwritten signature in black ink, appearing to be 'Alejandro Moreno', written over a horizontal line.

Alejandro Moreno Managing Director

Date: April 2020