

This anti-bribery and corruption policy set out BibbEgan Group (BIBBEGAN 's) responsibilities in regard to observing and upholding our zero-tolerance position on bribery and corruption. It also acts as a source of information and guidance for those working for BIBBEGAN GROUP OF COMPANIES LIMITED, helping them to recognise and deal with bribery and corruption issues.

BibbEgan Group Limited is committed to conducting business in an ethical and honest manner and implementing and enforcing systems that ensure bribery is prevented. BIBBEGAN are committed to acting professionally, fairly, and with integrity in all business dealings and relationships.

BibbEgan will constantly uphold all laws relating to anti-bribery and corruption in all the jurisdictions in which we operate. We are bound by the laws of the UK, including the Bribery Act 2010, in regard to our conduct both at home and abroad.

BibbEgan recognises that bribery and corruption are punishable by up to ten years of imprisonment and/or a fine. If our company is discovered to have taken part in corrupt activities, we may be subjected to an unlimited fine, be excluded from tendering for public contracts, and face serious damage to our reputation. It is with this in mind that we commit to preventing bribery and corruption in our business and take our legal responsibilities seriously.

This **anti-bribery policy** applies to all employees (temporary or permanent), or any other person or persons associated with us (including third parties), or any of our subsidiaries or their employees. The policy also applies to Officers, Trustees, Board, and/or Committee members at any level.

In the context of this policy, third-party refers to any individual or organisation our company meets and works with, including potential clients, consultants, contractors, suppliers, distributors, business contacts, agents, advisers, and government and public. Any arrangements our company makes with a third party is subject to clear contractual terms, including specific provisions that require the third party to comply with minimum standards and procedures relating to anti-bribery and corruption.

The **definition of bribery** refers to the act of offering, giving, promising, asking, agreeing, receiving, accepting, or soliciting something of value or of an advantage so to induce or influence an action or decision. A bribe refers to any inducement, reward, or object/item of value offered to another individual in order to gain commercial, contractual, regulatory, or personal advantage. Bribery is not limited to the act of offering a bribe. If an individual is on the receiving end of a bribe and they accept it, they are also breaking the law.

Bribery is illegal. Employees must not engage in any form of bribery, whether it be directly, passively (as described above), or through a third party (such as an agent or distributor). They must not accept bribes in any degree and if they are uncertain about whether something is a bribe or a gift or act of hospitality, they must seek further advice from the company's management.



James Bibbey

Managing Director

for and on behalf of BibbEgan Group Limited
and all its subsidiaries.

January 2024

What IS and IS NOT acceptable

Gifts and hospitality - BIBBEGAN accepts normal and appropriate gestures of hospitality and goodwill (whether given to/received from third parties) so long as the giving or receiving of gifts meets the following requirements:

- It is not made with the intention of influencing the party to whom it is being given, to obtain or reward the retention of a business or a business advantage, or as an explicit or implicit exchange for favours or benefits.
- It is not made with the suggestion that a return favour is expected.
- It is in compliance with local law.
- It is given in the name of the company, not in an individual's name.
- It does not include cash or a cash equivalent (e.g. a voucher or gift certificate).
- It is appropriate for the circumstances (e.g. giving small gifts around Christmas or as a small thank you to a company for helping with a large project upon completion).
- It is of an appropriate type and value and given at an appropriate time, taking into account the reason for the gift.
- It is given/received openly, not secretly.
- It is not selectively given to a key, influential person, clearly with the intention of directly influencing them.
- It is not above a certain excessive value (usually in excess of £100).
- It is not offer to, or accepted from, a government official or representative or politician or political party, without the prior approval of the company's compliance manager.
- Where it is inappropriate to decline the offer of a gift (i.e. when meeting with an individual of a certain religion/culture who may take offence), the gift may be accepted so long as it is declared to the compliance manager, who will assess the circumstances.

BIBBEGAN recognises that the practice of giving and receiving business gifts varies between countries, regions, cultures, and religions, so definitions of what is acceptable and not acceptable will inevitably differ for each. As good practice, gifts given and received should always be disclosed to management.

The intention behind a gift being given/received should always be considered and if there is any uncertainty, the advice from management should be sought.

Facilitation Payments and Kickbacks - BIBBEGAN does not accept and will not make any form of facilitation payments of any nature. We recognise that facilitation payments are a form of bribery that involves expediting or facilitating the performance of a public official for a routine governmental action. We recognise that they tend to be made by low level officials with the intention of securing or speeding up the performance of a certain duty or action. BIBBEGAN does not allow kickbacks to be made or accepted. We recognise that kickbacks are typically made in exchange for a business favour or advantage.



Anti-Bribery & Corruption Policy

BIBBEGAN recognises that, despite our strict policy on facilitation payments and kickbacks, employees may face a situation where avoiding a facilitation payment or kickback may put their/their family's personal security at risk. Under these circumstances, the following steps must be taken: a) keep any amount to the minimum; b) ask for a receipt, detailing the amount and reason for the payment; c) keep a record of the payment; d) report this incident management.

Political Contributions – BIBBEGAN will not make donations, in cash, kind, or any other means, to support any political parties or candidates. We recognise this may be perceived as an attempt to gain an improper business advantage.

Charitable Contributions – BIBBEGAN accepts the act of donating to charities – whether through services, knowledge, time, or direct financial contributions (cash or otherwise) – and agrees to disclose all charitable contributions it makes. Employees must be careful to ensure that charitable contributions are not used to facilitate and conceal acts of bribery. We will ensure that all charitable donations made are legal and ethical under local laws and practices, and that donations are not offered/made without the approval of the compliance manager.

Employee Responsibilities

All employees of BIBBEGAN must read, understand, and comply with the information contained within this policy, and with any training or other anti-bribery and corruption information you are given. All employees and those under our control are equally responsible for the prevention, detection, and reporting of bribery and other forms of corruption. They are required to avoid any activities that could lead to, or imply, a breach of this anti-bribery policy.

If any employee believes or suspects that an instance of bribery or corruption has occurred or will occur in the future that breaches this policy, they must notify their line manager.

If any employee breaches this policy, they will face disciplinary action and could face dismissal for gross misconduct. BIBBEGAN has the right to terminate a contractual relationship with an employee if they breach this anti-bribery policy.

How to raise a concern

If you suspect an instance of bribery or corrupt activities occurring, you are encouraged to raise your concerns as soon as possible. If you're uncertain about whether a certain action or behaviour can be considered bribery or corruption, you should speak to your line manager or Director.

BIBBEGAN will familiarise all employees with its whistleblowing procedures so employees can vocalise their concerns swiftly and confidentially.

If you are a victim of bribery or corruption

You must tell your line manager as soon as possible if you are offered a bribe by anyone, if you are asked to make one, if you suspect that you may be bribed or asked to make a bribe in the near future, or if you have reason to believe that you are a victim of another corrupt activity. Protection If you refuse to accept or offer a bribe or you report a concern relating to potential act(s) of bribery or corruption, BIBBEGAN understands that you may feel worried about potential repercussions. BIBBEGAN will support anyone who raises concerns in good faith under this policy, even if investigation finds that they were mistaken.

BIBBEGAN will ensure that no one suffers any detrimental treatment as a result of refusing to accept or offer a bribe or other corrupt activities or because they reported a concern relating to potential act(s) of bribery or corruption. Detrimental treatment refers to dismissal, disciplinary action, treats, or unfavourable treatment in relation to the concern the individual raised. If you have reason to believe you've been subjected to unjust treatment as a result of a concern or refusal to accept a bribe, you should inform your line manager immediately.

Training and communication

BIBBEGAN will provide training on this policy as part of the induction process for all new employees. BIBBEGAN's anti-bribery and corruption policy and zero-tolerance attitude will be communicated to all suppliers, contractors, business partners, and any third-parties at the outset of business relations.



Anti-Bribery & Corruption Policy

This policy does not form part of an employee's contract of employment and BIBBEGAN may amend it at any time so to improve its effectiveness at combatting bribery and corruption.

A handwritten signature in black ink, appearing to read 'JB'.

James Bibbey

Managing Director

for and on behalf of BibbEgan Group Limited and all its subsidiaries.

January 2024