

## Bribery Act 2018 Policy Statement

### 1.0 Introduction

Bribery is a criminal offence. We do not, and will not, pay bribes or offer improper inducements to anyone for any purpose, nor do we or will we, accept bribes or improper inducements.

To use a third party as a conduit to channel bribes to others is a criminal offence. We do not, and will not, engage indirectly in or otherwise encourage bribery.

We require that all personnel, including those permanently employed, temporary agency staff and contractors:

- Act honestly and with integrity at all times and to safeguard the organisation's resources for which they are responsible
- Comply with the spirit, as well as the letter, of the laws and regulations of all jurisdictions in which the organisation operates, in respect of the lawful and responsible conduct of activities.

### 1.1 Bribery is not tolerated, it is unacceptable:

- To give, promise to give, or offer a payment, gift, hospitality or other advantage with the intention that a business advantage will be received, or to reward a business advantage already given
- To give, promise to give, or offer a payment, gift, hospitality or other advantage to a government official, agent or representative to "facilitate" or expedite a routine procedure
- To request or accept a payment, gift, hospitality or other advantage from a third party with the intention that you or someone else will then provide a business advantage to that third party
- For you or someone else you asked or someone else with your approval to provide a business advantage to a third party in anticipation of or as a consequence of requesting or accepting a payment, gift, hospitality or other advantage from that third party
- To request or accept a payment, gift, or hospitality or other advantage from a third party in return for having provided a business advantage to that third party
- Retaliate against or threaten a person who has refused to commit a bribery offence or who has raised concerns under this policy
- Engage in activity in breach of this policy.

1.2 Facilitation payments are not tolerated and are illegal. Facilitation payments are unofficial payments in order to secure or expedite actions.

The prevention, detection and reporting of bribery is the responsibility of everyone who is subject to this policy. Everyone is required to avoid activity that breaches this policy. You must:

- Ensure that you read, understand and comply with this policy
- Raise concerns as soon as possible if you believe or suspect that a conflict with this policy has occurred, or may occur in the future.

### 1.3 Objective of this policy

This policy provides a coherent and consistent framework to enable the organisation's employees to understand and implement arrangements enabling compliance. In conjunction with related policies and key documents it will also enable employees to identify and effectively report a potential breach.

### Scope of this policy

This policy applies to all of the organisation's activities. For partners, joint ventures and suppliers, we will seek to promote the adoption of policies consistent with the principles set out in this policy.