

## ANTI-CORRUPTION AND BRIBERY

It is the Company's policy to conduct all business in an honest and ethical manner and in accordance with the Bribery Act 2010.

We take a zero-tolerance approach to bribery and corruption and are committed to acting professionally, fairly and with integrity in all our business dealings and relationships and implementing and enforcing effective systems to counter bribery.

The following are examples of offence under the Bribery Act 2010. It is not an exhaustive list, but it is not acceptable for you (or someone on your behalf) to:

- (a) give, promise to give, or offer, a payment, gift or hospitality with the expectation or hope that a business advantage will be received, or to reward a business advantage already given;
- (b) give, promise to give, or offer, a payment, gift or hospitality to a government official, agent or representative to "facilitate" or expedite a routine procedure;
- (c) accept payment from a third party that you know, or suspect is offered with the expectation that it will obtain a business advantage for them;
- (d) accept a gift or hospitality from a third party if you know or suspect that it is offered or provided with an expectation that a business advantage will be provided by you or the Company in return;
- (e) threaten or retaliate against another worker who has refused to commit a bribery offence or who has raised concerns under this policy; or
- (f) engage in any activity that might lead to a breach of this policy.

If you commit an offence under the Bribery Act 2010 you may be punished by up to ten years' imprisonment. If the Company is found to have taken part in corruption it could face an unlimited fine, be excluded from tendering for public contracts and face damage to its reputation. We therefore take our legal responsibilities very seriously indeed.

You are encouraged to raise concerns about any issue or suspicion that the offences mentioned above are being carried out as soon as possible. If you are unsure whether a particular act constitutes bribery or corruption, or if you have any other queries, these should be raised with your manager.



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Les Davies  
Managing Director  
Vygon (UK) Ltd.