

ANTI-BRIBERY AND CORRUPTION POLICY

1. Policy Statement

Bribery and corruption remain a major issue in world trade, despite the many dedicated efforts to prevent them. Fawkes & Reece takes a zero tolerance approach to bribery and corruption and is committed to acting professionally, fairly and with integrity in all its business dealings and relationships wherever it operates. Fawkes & Reece conducts its business to the highest legal and ethical standards and will not be party to corruption or bribery in any form.

Fawkes & Reece will uphold all relevant legislation to counter bribery and corruption. Our legal obligations are substantially greater since 1 July 2011 when the Bribery Act 2010 came into force in the UK. The Act affects us, as a UK company, if bribery occurs anywhere in our business. Bribery and corruption are punishable for individuals by up to ten years' imprisonment and if we are found to have taken part in corruption we could face an unlimited fine, be excluded from tendering for public contracts and face damage to our reputation. We therefore take our legal responsibilities very seriously.

2. Bribery

What is bribery?

A bribe is an inducement or reward offered, promised or provided in order to gain any commercial, contractual, regulatory or personal advantage.

What is not acceptable?

It is not acceptable for you (or someone on your behalf) to:

- 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;
- 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;
- 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;
- 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 us in return;
- Threaten or retaliate against another worker who has refused to commit a bribery offence or who has raised concerns under this policy; or
- Engage in any activity that might lead to a breach of this policy.

3. Corruption and Tax Evasion

Fawkes & Reece upholds all relevant legislation to prevent corruption and tax evasion within the business operations. We understand our legal obligations and ensure we abide by the Criminal Finances Act 2017 to report any activities which break such legislation.

4. Facilitation Payments and Kickbacks

We do not make, and will not accept, facilitation payments or "kickbacks" of any kind.

Facilitation payments are typically small, unofficial payments made to secure or expedite a routine government action by a government official, such as speeding up a visa or license application. They are not commonplace in the UK however can occur. If you are asked to make a payment on our behalf, you should always be mindful of what the payment is for and whether the amount requested is disproportionate to the goods or services provided. If you have any suspicions, concerns or queries regarding the payment, you should raise them with the Head of Contracts and Compliance.

Kickbacks are typically payments made in return for a business favour or advantage. All employees must avoid any activity that might lead to a suggestion that a kickback payment will be made or accepted by us.

5. Gifts and Hospitality

This policy does not prohibit normal and appropriate hospitality (given and received) to or from third parties. The test to be applied is whether in all circumstances the gift or hospitality is reasonable and justifiable. The intention behind the gift should always be considered.

6. Your Responsibilities

You must ensure that you read, understand and comply with this policy.

The prevention, detection and reporting of bribery and other forms of corruption are the responsibility of all those working for us or under our control. All employees are required to avoid any activity that might lead to, or suggest, a breach of this policy.

You must notify your manager as soon as possible if you believe or suspect that a conflict with this policy has occurred, or may occur in the future. For example, if a client or potential client offers you something to gain a business advantage with us, or indicates to you that a gift or payment is required to secure their business.

Any employee who breaches this policy will face disciplinary action under the company's Disciplinary Procedure, which could result in dismissal for gross misconduct. We reserve our right to terminate our contractual relationship with other employees if they breach this policy.

7. Record Keeping

We must keep financial records and have appropriate internal controls in place which evidence the business reason for making payments to third parties.

You must declare and keep a written record of all hospitality or gifts accepted or offered, which will be subject to managerial review.

You must ensure all expenses claims relating to hospitality, gifts or expenses incurred to third parties are submitted in accordance with our expenses policy and specifically record the reason for the expenditure.

All accounts, invoices, memoranda and other documents and records relating to dealings with third parties, such as clients, suppliers and business contacts, should be prepared and maintained with strict accuracy and completeness.

No accounts must be kept "off-book" to facilitate or conceal improper payments.

8. How to Raise a Concern

You are encouraged to raise concerns about any issue or suspicion of malpractice at the earliest possible stage. 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 or supervisor. Concerns should be reported by following the procedure set out in our Whistleblowing Policy.

9. Protection

Employees who refuse to accept a bribe or those who raise concerns or report another's wrongdoing are sometimes worried about possible repercussions. Fawkes & Reece aims to encourage openness and will support anyone who raises genuine concerns in good faith under this policy. Even if they turn out to be mistaken.

Fawkes & Reece is committed to ensuring that no one suffers unfavourable treatment as a result of refusing to take part in bribery or corruption, or because of reporting a good faith suspicion that an

actual or potential bribery or corruption offence has taken place, or may take place in the future. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the Head of Contracts & Compliance immediately. If the matter is not remedied you should raise it formally using the company's Grievance Procedure.

10. Training and Communication

All workers will receive regular, relevant training on how to implement and adhere to this policy. This policy and associate training programs will be maintained and reviewed from time to time.

A zero tolerance approach to bribery and corruption must be communicated to all suppliers, contractors, clients and business partners at the outset of the business relationship with Fawkes & Reece and as appropriate thereafter.

11. Responsibility

The board of directors has overall responsibility for ensuring this policy complies with the legal and ethical obligations, and all those under Fawkes & Reece's control comply with it. Management at all levels are responsible for ensuring those reporting to the manager understand this policy and have received adequate and regular training on it.

12. Policy Monitoring and Disciplinary Procedures

Fawkes & Reece will monitor the effectiveness and implementation of this policy, regularly considering its suitability, adequacy and effectiveness. Any improvements identified will be made as soon as possible. Internal control systems and procedures will be subject to regular audit to provide assurance that they are effective in countering bribery and corruption.

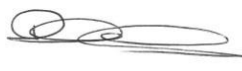
This policy will be made available to all employees and other users upon their commencement with Fawkes & Reece.

Failure to comply with this Anti-Bribery and Corruption Policy may lead to disciplinary action under the company's Disciplinary Procedure. In certain circumstances, legal action may be taken.

13. Review

This policy will be reviewed regularly and may be altered from time to time in light of legislative changes or other prevailing circumstances.

Signed:



Position:

Managing Director

Date:

November 2022

