



ANTI BRIBERY & ANTI-CORRUPTION POLICY

PROPRIETARY STATEMENT

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Introduction

This anti-bribery policy exists to set out the responsibilities of those who work for us in regard to observing and upholding our zero-tolerance position on bribery and corruption.

This policy is to provide guidance on how to conduct business to the highest ethical standards by complying with the relevant Anti-Bribery legislation.

1. The Policy

The Company is committed to conducting business in an ethical and honest manner and is committed to implementing and enforcing systems that ensure bribery is prevented under all circumstances. The Company has zero-tolerance with bribery and corrupt activities. We are committed to acting professionally, fairly, and with the highest integrity in all our business dealings and relationships, wherever in the world we operate.

The Company shall constantly uphold all laws relating to anti-bribery and corruption in all the jurisdictions we operate and be bound by the laws of the relevant country regarding our conduct.

The Company recognizes that bribery and corruption are punishable acts under law, and we commit to preventing bribery and corruption in our business and take our legal responsibility seriously.

2. Who is covered by our Policy?

This anti-bribery policy applies to all employees, whether temporary, permanent, consultants, contractors, trainees, seconded staff, home workers, or any other person or persons associated with the Company.

Any arrangements the 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.

3. Definition of Bribery

Bribery refers to the act of offering, giving, promising, requesting, 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.



If an individual is on the receiving end of a bribe and they accept it, they are also breaking the law. Employees must not engage in any form of bribery, whether it be directly, passively or through a third party. They must not accept bribes in any degree and if they are uncertain about whether something is a bribe or a give or act of hospitality, they must seek further advice from the HR/Office Administrator.

4. What is and what is not acceptable

The Company accepts normal and appropriate gestures of hospitality and goodwill so long as the giving or receiving of gifts meets specific requirements and not made with the intention to influence the party to whom same is being given.

Where it may be considered inappropriate to decline a gift or gesture of goodwill aligned with certain religions or cultures that may take offence, a gift or gesture of goodwill may be accepted on the basis that same is declared to the HR/Office Administrator who will assess the specific circumstances.

The Company recognizes that the practice of giving and receiving business gifts varies between countries, regions, cultures and religions so definitions of what is acceptable and not will inevitably differ under these circumstances.

As good business practice, gifts given and received should always be disclosed to the HR/Office Administrator.

5. Charitable contributions

The Company will ensure that all charitable donations made are legal and ethical under local legislation and that same are not offered without the prior approval of the Chairman.

6. What happens if a concern needs to be raised?

If you suspect that there is an instance of bribery or corrupt activities occurring in relation to the Company, you should raise such concerns with the HR/Office Administrator.

7. What to do if you are a victim of bribery or corruption

You must inform the HR/Office Administrator as soon as possible if you are offered a bribe, if you are asked to make one, or if you have reason to believe that you are a victim of another corrupt activity.