



## CORPORATE CRIMINAL OFFENCE POLICY

### Introduction

The Company is committed to conducting its business with the highest standards of integrity and ethical behavior. This policy sets out the Company's approach to preventing and detecting corporate criminal offences.

### Policy Statement

The Company will not tolerate any form of criminal conduct by its employees, agents, or third-party representatives. The Company will take all reasonable steps to prevent, detect, and report criminal offences.

### Key Principles

- **Due Diligence:** The Company will conduct appropriate due diligence on its employees, agents, and third-party representatives to mitigate the risk of criminal conduct.
- **Training and Awareness:** The Company will provide regular training to employees on relevant legal and ethical standards, including bribery and corruption, fraud, money laundering, and health and safety.
- **Risk Assessment:** The Company will conduct regular risk assessments to identify potential areas of criminal risk and implement appropriate controls.
- **Reporting and Investigation:** The Company will establish clear procedures for reporting suspected or actual criminal offences. Any allegations will be investigated promptly and thoroughly.
- **Disciplinary Action:** The Company will take appropriate disciplinary action against any employee found to have committed a criminal offence.
- **Cooperation with Authorities:** The Company will cooperate fully with law enforcement agencies in the investigation and prosecution of criminal offences.

### Procedures

- **Reporting:** All employees are encouraged to report any suspected or actual criminal offences to their manager, HR department, or a designated compliance officer.
- **Investigation:** The Company will conduct a prompt and thorough investigation into all reported incidents.
- **Record Keeping:** The Company will maintain accurate records of all investigations and disciplinary actions.
- **Reporting to Authorities:** The Company will report serious criminal offences to the relevant authorities, such as the police or Serious Fraud Office.

### Amendments to this policy

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This policy is non-contractual and may be amended from time-to-time in line with changes to legislation and best practice.