



ANTI-CORRUPTION AND BRIBERY POLICY

STATEMENT:

WE TAKE A ZERO-TOLERANCE APPROACH TO BRIBERY AND CORRUPTION AND ARE COMMITTED TO ACTING PROFESSIONALLY, FAIRLY AND WITH INTEGRITY

It is our policy to conduct all our business in an honest and ethical manner. 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.

All forms of bribery are strictly prohibited, specifically:

- Give or offer any payment, gift, hospitality or other benefit in the expectation that a business advantage will be received in return, or to reward any business received;
- Accept any offer from a third party suspected to have an expectation that we will provide a business advantage for them or anyone else; or
- Give or offer any payment (sometimes called a facilitation payment) to a government official in any country to facilitate or speed up a routine or necessary procedure.

If offered a bribe, or asked to make one, or suspect any form of bribery, corruption, or other breach of this policy all employees must notify their manager or the People department.

This policy does not prohibit the giving or accepting of reasonable and appropriate hospitality for legitimate purposes such as building relationships, maintaining our image or reputation or marketing our products and services. Promotional gifts of low value such as branded stationery may be given to or accepted from existing customers, suppliers and business partners.

All hospitality or gifts given or received must be declared to the line manager. All expense claims related to hospitality, gifts or payments to third-parties must be recorded and justified as per internal expenses policy and procedures.

We accept and encourage the act of donating to charities as part of our corporate social responsibility initiatives. We ensure that such donations are not used as subterfuge for bribery or act as a conduit to fund illegal activities in violation of international anti-money laundering, anti-terrorism and other applicable laws.

We provide regular anti-corruption training to educate our employees about the requirements and obligations of anti-corruption and bribery laws.

This policy is reviewed and approved by the Board of Directors on an annual basis and communicated to all levels via our communication channels.

Robert Campbell
Chief Executive Officer