

## ANTI-BRIBERY & CORRUPTION POLICY

### STATEMENT AND PURPOSE OF POLICY

The Owens Group is committed to conducting its business in an honest and ethical manner. As involvement in bribery and corruption exposes the Owens Group and its employees and representatives to a criminal offence; damages the business' reputation and damages the confidence of any client or customer, supplier, and business partners.

The purpose of this policy is to convey to all employees and interested parties of the Company the rules in relation to our unequivocal stance towards the eradication of bribery and corruption our commitment to ensuring that business is conducted in a fair, professional and legal manner.

### DEFINITIONS OF BRIBERY AND CORRUPTION.

Corruption is the misuse of office or power for private gain. Bribery is a form of corruption which means in the course of business giving or receiving money, gifts, meals, entertainment, or anything else of value as an inducement to a person to do something which is dishonest or illegal.

Bribery is, in the conduct of the Company's business, the offering or accepting of any gift, loan, payment, reward or advantage for personal gain as an encouragement to do something which is dishonest, illegal or a breach of trust.

Bribery is a criminal offence. The Company prohibits any form of bribery. We require compliance, from everyone connected with our business, with the highest ethical standards and anti-bribery laws applicable. Integrity and transparency are of utmost importance to us and we have a zero-tolerance attitude towards corrupt activities of any kind, whether committed by Company employees or by third parties acting for or on behalf of the Company.

### OFFENCES

It is a criminal offence to:

- Offer a bribe.
- Accept a bribe.
- Bribe a foreign official.
- As a commercial organisation, to fail to prevent a bribe.

Staff who fail to comply with this Policy may commit a criminal offence and the criminal law relating to bribery and corruption and could carry several penalties.

## SCOPE

This policy applies to all employees, regardless of seniority or site. It also extends to anyone working for or on our behalf e.g. those engaged by us on a self-employed basis or an agency arrangement.

We will encourage the application of this policy where our business involves the use of third parties e.g. suppliers; contractors.

## POLICY

It is prohibited, directly or indirectly, to offer, give, request or accept any bribe i.e. gift, loan, payment, reward or advantage, either in cash or any other form of inducement, to or from any person or company in order to gain commercial, contractual or regulatory advantage for the Company, or in order to gain any personal advantage for an individual or anyone connected with the individual in a way that is unethical.

It is also prohibited to act in the above manner in order to influence an individual in his capacity as a foreign public official. You should not make a payment to a third party on behalf of a foreign public official.

If you are offered a bribe, or a bribe is solicited from you, you should not agree to it unless your immediate safety is in jeopardy. You should immediately contact the Head of People so that action can be taken if considered necessary. You may be asked to give a written account of events.

If you, as an employee or person working on our behalf, suspect that an act of bribery, or attempted bribery, has taken place, even if you are not personally involved, you are expected to report this, or to contact your manager or Group Human Resources Manager. You may be asked to give a written account of events.

Appropriate checks will be made before engaging with suppliers or other third parties of any kind to reduce the risk of our business partners breaching our anti-bribery rules.

The Company will ensure that all its transactions, including any sponsorship or donations given to charity, are made transparently and legitimately.

Any actual or suspected breach of this policy will be taken extremely seriously and a thorough investigation will be carried out should any instances arise.

We will uphold laws relating to bribery and will take disciplinary action against any employee, or other relevant action against persons working on our behalf or in connection with us, should we find that an act of bribery, or attempted bribery, has taken place. This action may result in your dismissal if you are an employee, or the cessation of our arrangement with you if you are self-employed, an agency worker, contractor etc.

Staff are reminded of the Company's whistleblowing policy, which is available in the employee handbook, or upon request.

## **GIFTS AND HOSPITALITY**

We realise that the giving and receiving of gifts and hospitality where nothing is expected in return helps form positive relationships with third parties where it is proportionate and properly recorded. This does not constitute bribery and consequently such actions are not considered a breach of this policy.

Gifts include money; goods (flowers, vouchers, food, drink, event tickets when not used in a hosted business context); services or loans given or received as a mark of friendship or appreciation.

Hospitality includes entertaining; meals or event tickets (when used in a hosted business context) given or received to initiate or develop relations. Hospitality will become a gift if the host is not present.

No gift should be given nor hospitality offered by an employee or anyone working on our behalf to any party in connection with our business without receiving prior written approval from a Director of the Company or the Group Human Resources Manager. Similarly, no gift nor offer of hospitality should be accepted by an employee or anyone working on our behalf without receiving prior written approval from a Director of the Company or the Group Human Resources Manager.

## **KEEPING RECORDS**

As transparency is crucial, it is essential that the business keeps a full and accurate record of all financial dealings under this policy. As a result, staff must declare and properly record in writing all hospitality and gifts received or given. A record will be made of every instance in which gifts or hospitality are given or received.

## **REPORTING ISSUES RELATING TO BRIBERY AND CORRUPTION**

All staff have a responsibility to comply with this Policy and prevent bribery and corruption and must notify their Manager/Director/Group Human Resources Manager as soon as possible.

As the law is constantly changing, this policy is subject to review and the Company reserves the right to amend this policy without prior notice.