**Anti- bribery and Anti-corruption Policy**

## 1. General Statement

1.1 This policy applies to the Serocor Group of companies. You are an employee or contractor of a Serocor Group company. Any reference to "Serocor" or "the Serocor Group" refers to that Serocor Group company and, where relevant, the other companies within the Serocor Group.

1.2 It is our policy to conduct all of 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.

1.3 You must fully comply with this policy. If you breach this policy, you will face disciplinary action up to and including termination of your engagement/summary dismissal.

1.4 This policy should be read in conjunction with the other Serocor policies available on the Serocor intranet.

## 2. What is Bribery?

2.1 A "bribe" is a financial or other inducement or reward for action which is illegal, unethical, a breach of trust or improper in any way. Bribes can take the form of money, gifts, loans, fees, hospitality, services, discounts, the award of a contract or any other advantage or benefit.

2.2 "Bribery" includes offering, promising, giving, accepting or seeking a bribe.

2.3 All forms of bribery are strictly prohibited. If you are unsure about whether a particular act constitutes bribery, you must raise it with your Line Manager and the Legal Department immediately.

2.4 Specifically, you must not:

(a) 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;

(b) accept any offer from a third party that you know or suspect is made with the expectation that we will provide a business advantage for them or anyone else; or

(c) give or offer any payment to a government official in any country to facilitate or speed up a routine or necessary procedure.

2.5 You must not threaten or retaliate against another person who has refused to offer or accept a bribe or who has raised concerns about possible bribery or corruption.

## 3. Gifts and Hospitality

3.1 This policy does not prohibit the giving or receiving of reasonable and appropriate gifts and hospitality for legitimate business purposes such as building relationships, maintaining our image or reputation, or marketing our services.

3.2 Gifts and hospitality must be of an appropriate type and value depending on the circumstances and taking account of the reason for it. A gift or hospitality will not be appropriate if it is unduly lavish or extravagant, or could be seen as an inducement or reward for any preferential treatment.

3.3 You must not give or accept any gift or hospitality which could be considered inappropriate. Here are some examples of appropriate and inappropriate gifts and hospitality:

| Appropriate | Inappropriate |
|---|---|
| A reasonably priced bottle of wine received from a client as a thank you for doing a great job. | An iPad personally received from an umbrella company. |
| Taking a client out for a reasonably priced meal to build our relationship with the client. | Giving a client an expensive bottle of wine. |
| Taking a client to a sporting event to build our relationship with the client. | Giving a client tickets to a sporting event so the client can attend without us. |

3.4 If you are offered a gift or hospitality which is unduly lavish or extravagant, or could be seen as an inducement or reward for any preferential treatment, you must politely decline it.

## 4. Claiming Expenses

4.1 You must submit all expenses claims relating to hospitality, gifts or payments to third parties in accordance with Serocor's expenses policy and record the reason for the expenditure on your expenses claim form.

4.2 All accounts, invoices, and other records relating to dealings with third parties including suppliers and customers should be prepared with strict accuracy and completeness. Accounts must not be kept "off-book" to facilitate or conceal improper payments.

## 5. How to Raise a Concern

If you are offered a bribe, or are asked to make one, or if you suspect that any bribery, corruption or other breach of this policy has occurred or may occur, you must notify the Operations Department immediately. You must not take any further action without senior authorisation.

## 6. Status of this Policy and Reviews

This policy does not form part of any person's contract of employment/engagement and may be amend it at any time. This policy will be reviewed periodically to take account of changes in the law and best practice guidance.

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| **Policy Owner** | Human Resources | **Approved by** | Chief Operations Officer |
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