

OPEN

## **Anti-Bribery & Corruption Policy Statement**

The Chief Executive Officer and Senior Leadership Team of Augustus Martin Ltd are committed to upholding all relevant laws including, but not limited to, the UK Bribery Act 2010 and corresponding laws applicable to the countries in which we operate.

It is the company's policy to operate with professionalism, fairness and at all times with integrity. We have a mechanism for assessing risks and ensure all staff members are aware of their responsibilities in this regard.

Augustus Martin Ltd make commitments to:

- Identify and declare conflicts of interest
- Declare gifts or hospitality for registration and approval
- Be transparent in our dealings with charities and government bodies
- Ensure suppliers are engaged fairly via our Supplier Validation Process
- Provide appropriate training to relevant stakeholders

This policy guides us to give consideration to:

- Corruption in any form
- Bribery
- Giving or receiving of gifts and hospitality
- Influential relationships and objectivity

The company will maintain awareness of all applicable laws, conventions and regulations relating to the topics covered by this policy.

This policy will be revised when:

- There are major changes in the size and nature of the business
- Changes in relevant legislation and other requirements

To ensure that this policy remains up to date, it shall be reviewed annually.

This policy is supported and endorsed by the Augustus Martin Senior Management Team, including Michael John (CEO).

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