

# Anti-Bribery and Corruption Policy

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## 1. Purpose

Statom Group is committed to conducting business in an ethical and honest manner, in full compliance with the UK Bribery Act 2010 and all relevant anti-corruption legislation. This policy aims to ensure that all employees, contractors, and representatives understand the prohibition of bribery and corruption while providing guidance on preventing and reporting incidents.

## 2. Scope

This policy applies to all individuals working for or on behalf of Statom Group, including employees, officers, contractors, consultants, home-workers, volunteers, and agency workers. It also extends to all business dealings and relationships with third parties, including suppliers, customers, and government officials.

## 3. Definition of Bribery and Corruption

Bribery is the offering, promising, giving, accepting, or soliciting of any advantage as an inducement for an illegal or unethical action. This includes monetary or non-monetary rewards intended to influence decisions. Corruption is the abuse of power for private gain.

Acts of bribery and corruption include:

- Offering or receiving gifts, hospitality, or benefits to influence decisions.
- Payments made to expedite routine processes (facilitation payments).
- Political or charitable contributions aimed at gaining an undue advantage.

## 4. Legal Consequences

The UK Bribery Act 2010 provides severe penalties for involvement in bribery and corruption, including imprisonment of up to ten years, unlimited fines, and reputational damage. The company may also be excluded from tendering for contracts if found guilty of bribery or corruption.

## 5. Prohibited Conduct

Statom Group has a zero-tolerance approach to bribery and corruption. The following practices are strictly prohibited:

- **Bribes:** Offering, receiving, or soliciting any form of bribe to gain commercial or personal advantage.
- **Facilitation Payments:** Small payments to expedite a routine service.
- **Kickbacks:** The return of a portion of a payment for preferential treatment.
- **Improper Gifts and Hospitality:** Providing or accepting gifts, hospitality, or entertainment intended to influence decision-making.

## 6. Gifts and Hospitality

Statom Group accepts reasonable and appropriate gifts and hospitality under the following conditions:

- They are not intended to influence a decision or act as an exchange for favours.
- They comply with local laws and company policies.
- They are given in the name of the company, not an individual.
- They do not involve cash or cash equivalents.
- They are appropriate to the situation and timing, and given/received openly.

All gifts and hospitality above £100 must be disclosed to and approved by the Managing Director and recorded in the Gifts and Hospitality Register.

## 7. Defining Acceptability

Acts of genuine hospitality must not be confused with bribery. To ensure clarity:

- Gifts and hospitality must not be selectively offered to key, influential individuals.
- Gifts from suppliers must be disclosed.
- Any uncertainty around gifts or hospitality should be referred to the Managing Director.

## 8. Political and Charitable Contributions

- **Political Contributions:** Statom Group does not make donations to political parties or candidates, as this may be perceived as an attempt to gain improper business advantage.
- **Charitable Contributions:** Donations to charities are encouraged but must be transparent and legal. Employees must ensure that charitable contributions are not used to disguise bribery, and all donations must be approved by the Managing Director.

## 9. Facilitation Payments and Kickbacks

Facilitation payments are strictly prohibited, regardless of the amount. These payments are illegal under the UK Bribery Act 2010, and the company will not tolerate any form of facilitation payment or kickback.

## 10. Due Diligence

Statom Group will conduct appropriate due diligence before entering into business relationships to ensure compliance with anti-bribery laws. This includes assessing the risk of bribery and ensuring that contracts include anti-bribery clauses.

## 11. Employee Responsibilities

Employees must:

- Comply with this policy and the UK Bribery Act 2010.
- Avoid any activity that could be seen as bribery or corruption.
- Report any concerns about bribery or corruption to the Managing Director.

Failure to comply may result in disciplinary action, including dismissal, and possible legal consequences.

## 12. Reporting and Whistleblowing

Statom Group encourages all employees and third parties to report concerns of bribery or corruption. Reports should be made to the Managing Director or through the company's confidential whistleblowing hotline. All reports will be investigated thoroughly, and employees will be protected from retaliation.

## 13. Training and Communication

Employees will receive regular training on anti-bribery and corruption, with additional specialised training for high-risk roles. The company's zero-tolerance approach to bribery and corruption will be communicated to all suppliers, contractors, and business partners at the outset of the relationship.

## 14. Monitoring and Review

Statom Group will periodically review this policy to ensure ongoing compliance with legal requirements and best practices. Audits will be conducted to assess the effectiveness of anti-bribery controls.

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**Effective Date:** 01/09/2024

**Policy Owner:** Martina Oyite – Head of HR

**Review Date:** 31/08/2025

