



**STATOM
GROUP**

STATOM Group

Limited Policy 005:

Anti-Bribery &

Corruption

2023/2024

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1 OBJECTIVE & STATEMENT

This anti-bribery and anti-corruption policy exists to set out the responsibilities of Statom Group Limited ("Statom", "the Company") and those who work for us in regard to observing and upholding our zero-tolerance position on bribery and corruption.

This policy shall also act as a source of information and guidance for those working for the company. It is intended to assist them in recognising and dealing with bribery and corruption issues, as well as understanding their responsibilities.

This policy will establish controls to ensure compliance with all applicable anti-bribery and corruption regulations, and to ensure that Statom Group Limited's business is conducted in a socially responsible and ethical manner.

1.1 Policy Statement

The Company is committed to conducting business ethically and honestly and to implementing and enforcing systems that ensure bribery is prevented. The Company has zero tolerance for bribery and corrupt activities. We are committed to acting professionally, fairly, and with integrity in all business dealings and relationships.

The Company will consistently uphold all laws relating to anti-bribery and corruption in all the jurisdictions in which we operate. We are bound by the laws of the UK, including the Bribery Act 2010, in regard to our conduct both at home and abroad.

The Company recognises that bribery and corruption are punishable by up to ten years of imprisonment and a fine. If the Company is discovered to have taken part in corrupt activities, we may be subjected to an unlimited fine, be excluded from tendering for contracts, and face serious damage to our reputation. It is with this in mind that we commit to preventing bribery and corruption in our business and take our legal responsibilities seriously.

1.2 Definition

Bribery is the offering, promising, giving, accepting or soliciting of an advantage as an inducement for an action which is illegal or a breach of trust. A bribe is an inducement or reward offered, promised or provided in order to gain any commercial, contractual, regulatory or personal advantage.

A bribe refers to any inducement, reward, or object/item of value offered to another individual in order to gain commercial, contractual, regulatory, or personal advantage. Bribery is not limited to the act of offering a bribe. If an individual is on the receiving end of a bribe and they accept it, they are also breaking the law.

Bribery is illegal. Personnel must not engage in any form of bribery, whether it be directly, passively (as described above), or through a third party (such as an agent or distributor). They must not accept bribes in any degree. If they are uncertain about whether something is a bribe or a gift, or an act of hospitality, they must seek further advice from the company's Managing Director.

1.3 The Bribery Act 2010

Through the enforcement of this policy and associated procedures, the Company will ensure compliance with the Bribery Act 2010. The Company understand and work to the definitions of bribery as defined in Section 1 and 2 of the act and detailed above.

The Company recognise that under Section 7 of the Bribery Act 2010, failure by a commercial organisation to prevent bribery that is intended to obtain or retain business is a corporate offence. The Company will not turn a blind eye to situations of bribery or corruption and deal with such cases through The Company's defined disciplinary procedure.

1.4 Scope

This anti-bribery policy applies to all personnel (whether temporary, fixed-term, or permanent), consultants, contractors, trainees, seconded staff, home workers, casual workers, agency staff, volunteers, interns, agents, sponsors, or any other person or persons associated with us (including third parties). The policy also applies to Officers, Trustees, Board, and/or Committee members at any level.

In the context of this policy, third-party refers to any individual or organisation our company meets and works with. It refers to actual and potential clients, customers, suppliers, distributors, business contacts, agents, advisers, and government and public bodies – this includes their advisors, representatives and officials, politicians, and public parties.

This policy thereby covers:

- Bribes;
- Gifts and hospitality;
- Facilitation payments;
- Political contributions;
- Charitable contributions.

2 PROCEDURES

The company have implemented procedures to prevent and detect bribery and corruption within the organisation. Procedures are based on six principles

2.1 Proportionality

The procedures implemented are proportionate to the bribery risks faced by the organisation. Should the risk level vary for reasons of business culture, economic or social factors, a proportionate response will be agreed upon to further control the

2.2 Top-Level Commitment

This Anti-Bribery and anti-corruption Policy and Procedure has the approval of the company directors. The directors are committed to preventing bribery and corruption throughout the organisation and creating a culture of zero-tolerance. The directors will be responsible for leading by example, communicating this policy and procedure to staff and making resources available to monitor compliance.

2.3 Risk Assessment

The nature and extent of The Company's exposure to bribery and corruption risks will be assessed on a periodic basis. These assessments will consider sources and channels of potential bribery and corruption and the financial and reputational impacts that would result from failure to prevent damaging actions. We shall also consider the supply chain and any high-risk suppliers who require additional monitoring.

In higher-risk relationships, consideration should be given to areas of weakness that may give rise to increased bribery risk, including:

- The lack of a clear anti-bribery message from top-level management.
- A bonus culture, or aggressive sales targets, that engender excessive risk-taking.
- A lack of clarity in the organisation's policies on, and procedures for, hospitality and promotional expenditure, and political or charitable contributions.
- A lack of clear financial controls.
- Deficiencies in team member training, skills and knowledge.
- Insufficient assurance, management information or audit work.
- Mitigating controls shall be put in place where necessary.

2.4 Due Diligence

The Company shall take appropriate care when entering relationships or markets with a risk of bribery. If the risk of bribery is considered to exist, a risk assessment shall be conducted, and ongoing monitoring activities shall be carried out.

2.5 Communication

This policy and procedure shall be communicated throughout the company. Relevant personnel will be briefed regarding any higher-risk relationships, market sectors or geographical areas within which awareness of bribery and corruption requires special attention.

The company provides a channel through which suspected instances of bribery or corruption can be reported.

2.6 Monitoring and Review

Monitoring and review shall be conducted through the following methods:

Future annual external audits from a UKAS-accredited certification body. Audit to include inspection of the level to which The Company is meeting its legislative requirements.

Periodic review - The Compliance Manager will monitor the effectiveness and review the implementation of this policy, regularly considering its suitability, adequacy and effectiveness. Any improvements identified will be made as soon as possible.

Internal control systems and procedures will be subject to periodic audits to provide assurance that they remain effective in countering bribery and corruption.

All team members are responsible for the success of this policy and should ensure they use established channels to disclose any suspected danger or wrongdoing. Statom personnel are invited to comment on this policy from their own perspectives and suggest ways in which it might be improved.

3

DEFINING ACCEPTABILITY

The line between a bribe and hospitality can be unclear in certain situations. Acts of genuine hospitality could be seen on the surface to fall within the Bribery Act, and instances of bribery could be masked as perceived acts of hospitality.

To bring clarity to acts which are considered acceptable and not acceptable, this section of the policy refers to 6 areas:

- Gifts and hospitality.
- Facilitation payments.
- Political contributions.
- Charitable contributions.
- The recording of gifts and hospitality.
- Conflicts of interest.

3.1 Gifts and Hospitality

The Company accepts normal and appropriate gestures of hospitality and goodwill (whether given to/received from third parties) so long as the giving or receiving of gifts meets the following requirements:

- It is not made with the intention of influencing the party to whom it is being given, to obtain or reward the retention of a business or a business advantage, or as an explicit or implicit exchange for favours or benefits.
- It is not made with the suggestion that a return favour is expected.
- It is made in compliance with local law.
- It is given in the name of the company, not in an individual's name.
- It does not include cash or a cash equivalent (*e.g.* a voucher or gift certificate).
- It is appropriate for the circumstances (*e.g.* giving small gifts around Christmas or as a small thank you to a company for helping with a large project upon completion).
- It is of an appropriate type and value and given at an appropriate time, taking into account the reason for the gift.
- It is given/received openly, not secretly.
- It is not selectively given to a key, influential person, clearly with the intention of directly influencing them.
- It is not above a certain excessive value, as pre-determined by the company's Managing Director (usually in excess of £100).
- It is not offered to, or accepted from, a government official or representative politician or political party, without the prior approval of the company's Managing Director.

Where it is inappropriate to decline the offer of a gift (i.e. when meeting with an individual of a certain religion/culture who may take offence), the gift may be accepted so long as it is declared to the directors, who will assess the circumstances.

As good practice, gifts given and received should always be disclosed to the Managing Director. Gifts from suppliers should always be disclosed regardless. The intention behind a gift being given/received should always be considered. If there is any uncertainty, the advice of the Managing Director must be sought.

3.2 Facilitation Payments and Kickbacks

Statom Group Limited does not accept and will not make any form of facilitation payments of any nature. We recognise that facilitation payments are a form of bribery that involves expediting or facilitating the performance of a public official for a routine governmental action. We recognise that they tend to be made by low-level officials with the intention of securing or speeding up the performance of a certain duty or action.

3.3 Political Contributions

Statom Group Limited will not make donations, whether in cash, kind or by any other means, to support any political parties or candidates. We recognise this may be perceived as an attempt to gain an improper business advantage.

3.4 Charitable Contributions

The Company accepts (and indeed encourages) the act of donating to charities – whether through services, knowledge, time, or direct financial contributions (cash or otherwise) – and agrees to disclose all charitable contributions it makes.

Team members must be careful to ensure that charitable contributions are not used to facilitate and conceal acts of bribery or corruption. We will ensure that all charitable donations made are legal and ethical under local laws and practices and that donations are not offered/made without the approval of the Managing Director.

3.5 Recording of Gifts and Hospitality

All gifts and hospitality, both given or received, should be reported to the Managing Director. The Managing Director is responsible for maintaining a list of gifts and hospitality to ensure ongoing transparency of this procedure. In doing so, the Managing Director will ensure that the gifts and hospitality are genuine acts and do not amass to either intentional or unintentional bribes.

3.6 Conflicts of Interest

A conflict of interest may arise where a team member has a direct or indirect interest in a transaction, contract or proposed contract. This could occur as a result of private business dealings, personal relationships or other activities outside the scope of employment.

Staff are required to report any potential or realised conflicts of interest to the Managing Director. The Managing Director will decide whether the potential conflict of interest will affect the manner in which the relationship between the two parties is conducted and what necessary action will be taken to prevent the possibility of inadvertent bribery, favouritism or corruption entering the operation.

Failure to report potential or actual conflicts of interest may result in disciplinary action being taken.

4

REPORTING & RESPONSIBILITY

4.1 Responsibility

The prevention, detection and reporting of bribery and corruption is the responsibility of all those working for the Company or under its control. All parties must:

- Ensure that they read, understand and comply with this policy.
- Raise concerns as soon as possible if it is believed or suspected that a conflict with this policy has occurred or may occur in the future.

As well as the possibility of civil and criminal prosecution, staff that breach this policy will face disciplinary action, which could result in dismissal for gross misconduct.

This policy and procedure has the authorisation of the company directors. The directors have a particular responsibility to ensure that the culture within the organisation promotes integrity and transparency and that all personnel adopt a zero-tolerance attitude towards bribery and corruption.

4.2 Raising a Concern

Statom Group Limited is committed to ensuring that all company personnel, organisations or persons associated with its business have a safe, reliable, and confidential way of reporting any suspicious activity.

Everyone has a responsibility to help detect, prevent and report instances of bribery. If an individual has a concern regarding a suspected instance of bribery or corruption, the Company encourages them to speak up. The earlier we receive information, the sooner action can be taken to stop and resolve any act of corruption.

Any reports are to be made foremost to the Managing Director. If, for any reason, this channel is not appropriate, then another director or an alternative member of the management team may be approached.

All reports will be treated in strict confidentiality. Whistleblowing is protected by law – and whistleblowers will not be treated unfairly or lose their jobs because they ‘blow the whistle’. If a team member wishes to make an anonymous report, this should be posted to The Company’s office and addressed to the attention of the appropriate person, listed above.

Reports will be thoroughly investigated with immediate effect. In the case that corruption or bribery is detected, a detailed root cause analysis shall be conducted and documented through The Company’s established non-conformance procedure. Based on the findings, preventative action will be implemented to avoid the reoccurrence of the issue in other areas of the business and other relationships.

4.3 Protection

Team members who refuse to accept or offer a bribe, or those who raise concerns or report another’s wrongdoing, are sometimes worried about possible repercussions. We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken.

We are committed to ensuring no one suffers any detrimental treatment as a result of refusing to take part in bribery or corruption, or because of reporting in good faith their suspicion that an actual or potential bribery or

other corruption offence has taken place or may take place in the future. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern.

If you believe that you have suffered any such treatment, you should inform the Compliance Manager or a member of the HR team immediately. If the matter is not remedied, and you are a Statom Group employee, you may raise it formally using the company's Grievance Procedure.

4.4 Training and Communication

Training on this policy forms part of the induction process for all new team members. All existing personnel will receive relevant training to support how to implement and adhere to this policy. In addition, all employed staff will be asked to accept conformance to this policy on an annual basis formally.

Our zero-tolerance approach to bribery and corruption will be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and as appropriate thereafter.

SIGNED: _____



Stan Nikudinski **Managing Director**

STATOM Group limited

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Review: Annual