




MONACOSOL GROUP

# ANTI-BRIBERY POLICY

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## Document Approval:

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# Anti-bribery Policy



## Introduction

Monacosol Ltd and its portfolio companies is dedicated to conducting all its business in an honest and ethical manner. The company takes a zero-tolerance approach to bribery and corruption and is committed to acting professionally and with integrity in all its business dealings and relationships.

Monacosol Ltd does not tolerate any form of bribery, embezzlement or corruption.

## Policy Statement

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

We take a zero-tolerance approach to bribery and corruption. We are committed to acting professionally, fairly and with integrity in all our business dealings and relationships wherever we operate, and implementing and enforcing effective systems to counter bribery.

We will uphold all laws relevant to countering bribery and corruption.

## Scope

Monacosol Ltd operates a scope of policies within the Monacosol Ltd investment portfolio. The aim of which is to streamline the management of policies into a centralised system. This policy shall apply to all Monacosol Ltd investments and be published and made available as appropriate.

In certain circumstances, it is appropriate to amend or alter a policy to meet specific requirements of a portfolio company. Any additional or amended elements to a specific policy will be noted in the final paragraph 'Policy Override'. If no section exists it can be accepted there are no overrides.

**This policy applies to all individuals working at all levels and grades. This policy covers:**

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



## Bribes

Employees must not engage in any form of bribery, either directly or through any third party.

## Gifts and hospitality

Employees must not offer or give any gift or hospitality which could be regarded as illegal or improper, or which violates the recipient's policies.

Any gift received or offered by employees must not exceed £150 in value for each individual gift or unless approved by a Monacosol Director.

No cash gifts should be offered or accepted.

If it is not appropriate to decline the offer of a gift, the gift may be accepted, provided it is then declared to a Monacosol Director.

If it is not clear whether it is appropriate to accept a gift advice should be sought from the Group Finance Director.

## Facilitation payments and kickbacks

Facilitation payments are a form of bribery made for the purpose of expediting or facilitating the performance of an action.

**Our strict policy is that facilitation payments must not be paid. However, in the event that personal security is at risk and a facilitation payment is unavoidable the following steps must be taken:**

- Keep any amount to a minimum;
- Create a record concerning the payment; and
- Report it to the Group Finance Director.

## Charitable contributions

Charitable support and donations are acceptable, whether in-kind services, knowledge, time, or direct financial contributions. However, Employees must ensure that charitable contributions are not used as a scheme to conceal bribery. Monacosol portfolio companies only make charitable donations that are legal and ethical. No donation must be offered or made without the prior approval of the Group Finance Director.

## Responsibilities

Employees must ensure that they read, understand and comply with this policy. Employees must declare and keep a written record of all hospitality or gifts accepted or offered, which will be subject to review by the Finance department.



The prevention, detection and reporting of bribery and other forms of corruption are the responsibility of all those working for a Monacosol portfolio company. All Employees are required to avoid any activity that might lead to, or suggest, a breach of this policy.

Employees must notify the Group Finance Director as soon as possible if it is believed or suspected that a conflict with or breach of this policy has occurred, or may occur in the future. It is important that an employee informs the Group Finance Director as soon as possible if they are offered a bribe by a third party, are asked to make one, suspect that this may happen in the future, or believe that they are a victim of another form of unlawful activity.

Any Employee who breaches this policy will face disciplinary action, which could result in dismissal for gross misconduct.

## **Monitoring and review**

The Group Finance Director 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.

All Employees are responsible for the success of this policy and should ensure they use it to disclose any suspected danger or wrongdoing.

This policy does not form part of any Employee's contract of employment, and it may be amended at any time.