

## Anti-Bribery Policy

### Statement

MiTek is committed to implementing and enforcing effective systems to counter bribery. Therefore, it is the Company's policy to conduct all aspects of its business in an honest and ethical manner at all times.

Under UK Law (UK Bribery Act 2010), bribery and corruption are punishable for individuals by up to ten years imprisonment. If the Company is found to have taken part in the corruption or lacks adequate procedures to prevent bribery, it could face an unlimited fine and be excluded from tendering for Government contracts.

### Policy

The aim of this policy is to help employees act in accordance with the Bribery Act 2010, maintain the highest possible standards of business practice, and advise the individual of the Company's Zero tolerance to bribery.

This policy applies to all permanent and fixed-term staff employed by the Company, and any contractors, consultants or other person's acting under or on behalf of the Company.

The Company will not:

- Make contributions of any kind with the purpose of gaining any commercial advantage.
- Provide gifts or hospitality with the intention of persuading anyone to act improperly, or to
- influence a public official in the performance of their duties.
- Make, or accept, "kickbacks" of any kind.

The Company will:

- Keep appropriate internal records that will evidence the business reason for making any payments to third parties
- Encourage employees to raise concerns about any issue of suspicion of malpractice at the earliest possible stage.
- See that anyone raising a concern about bribery will not suffer any detriment as a result, even if they turn out to be a mistake.

Employees must not:

- Accept any financial or other reward from any person in return for providing some benefit.
- Request a financial or other reward from any person in return for providing some benefit.
- Offer any financial or other reward from any person in return to providing some benefit.

### Non-compliance

All employees have a role to play in enforcing the policy and are required to deal with any observed or reported breaches. Should employees feel apprehensive about their own safety in regard to addressing any breach, they should seek senior management support.

Failure to comply with this policy may lead to lack of clarity over job role, learning needs or expected standards of performance, resulting in reduced effectiveness or efficiency, under-performance and putting service delivery at risk.

Any member of staff refusing to observe the policy will be liable to disciplinary action in accordance with the Company's Disciplinary Policy up to and including dismissal.

### Implementation of the Policy

Overall responsibility for policy implementation and review rests with the Board of Directors. However, all employees are required to adhere to and support the implementation of the policy. The Company will inform all existing employees about this policy and their role in the implementation of the policy.

They will also give all new employees notice of the policy on induction to the Company.

This policy should be read in conjunction with the MiTek Code of Conduct Policy.

### Amendments to the Policy

The Company retains the right to amend this policy in line with business needs. Any changes to the

policy will be communicated to you in writing.

**Signed:** Matt Loveday,

*Managing Director, MiTek Industries Ltd (Mezzanine Systems Business Unit)*



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*Policies are reviewed annually*