

## **Bribery and Corruption**

We will never offer, pay, solicit or accept bribes in any form, (including 'facilitation payments'), either directly or indirectly.

We will assess the risks of bribery and establish and operate proportionate procedures to address those risks.

We will establish a training programme for employees and relevant business partners to ensure that they understand their obligations and are familiar with our policies and procedures.

Our employees and relevant business partners are required, and will be given the facility, to report any suspicious activity or wrongdoing.

We will not employ agents to carry out actions that conflict with these commitments.

We will establish contractual obligations that require relevant business partners to develop and implement proportionate procedures that address bribery risks and take steps to ensure these obligations have been met.

We will conduct due diligence on relevant Business Partners and seek to ensure that they do not bribe others on our behalf.

We will avoid conflicts of interest.

We will only give or accept gifts and entertainment that are bona fide, reasonable and proportionate in the normal course of business, lawful in the territory in which they are made and which could not be interpreted as inducing improper conduct.

