



Policy 3.11
August 2022

THE ALUMASC GROUP PLC

GROUP ANTI-BRIBERY AND CORRUPTION POLICY

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This Policy sets out the responsibilities of The Alumasc Group plc and its subsidiaries (Alumasc or the Company), and those who work for us regarding and upholding our zero-tolerance approach to bribery and corruption. This policy is designed to help identify the risk and responsibilities for people who work for Alumasc and for third parties working this us.

1. Definition of Bribery and corruption

Bribery is giving someone a financial advantage or soliciting something of value to encourage that person to perform their functions or activities improperly or to reward that person for already having done so.

Corruption is abuse of entrusted power or position for inappropriate private gain and can include extortion and blackmail.

Our policy is to ensure compliance with the Bribery Act 2010 (the Act) and the US Foreign Corrupt Practices Act.

2. Who is covered by this Policy?

2.1 This Policy applies to all:

- Employees
- Contractors
- Trainees, apprentices, and interns
- Agents, agency, and temporary staff
- Sponsors

2.2 In addition, we expect this standard of conduct to be adhered to by anyone else associated with our Group, who perform services for us or on our behalf. This includes joint venture partners or those with whom we collaborate on projects or service provision for our clients. It includes our agents, brokers, sub-contractors, representatives, distributors, consultants, and other providers. Any arrangements we make with high risk third parties needs to be subject to clear contractual terms, including questionnaire responses to confirm compliance with our standards of anti-bribery and corruption.

2.3 In order to comply all employees must:

- act with integrity and within the law;
- consider the risk of bribery and corruption in any contract which is entered into, and with any third party that is engaged, and take appropriate action to mitigate any risks with advice from procurement professionals within the business and line management;
- record any gifts and hospitality as required by our Gifts and Hospitality Policy;
- follow all relevant procurement rules on supplier selection and due diligence, to ensure the supplier is financially stable and to make the right choice fairly, and that they have the right ethical and legal reputation;
- immediately report any suspected bribery and corruption incident, which is prohibited under UK law or any blackmail or extortion to your line Manager and/or to the Group Company Secretary.

3. Compliance

3.1 Group Policies, and rules are mandatory. You should read this Policy and if you do not understand any element of it, you should contact the Group Company Secretary. Any non-compliance may lead to disciplinary action, which could include dismissal. We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

3.2 The responsibility for the prevention, detection and reporting of bribery and other forms of corruption are the responsibility of all those working for or on behalf of Alumasc. All employees and parties listed in clause 2 must avoid any activity that might lead to or be perceived as a breach of this Policy.

4. Prohibited acts

You (or someone acting on your behalf) must not:

4.1 Give, promise to give, or offer, either directly or through a third party, a payment (including a facilitation payment), gift or hospitality or other thing of value (including but not limited to job opportunities for friend or family members, sponsorship of marketing events or educational events or other advantages) with the expectation or hope that a business advantage will be received, or to reward a business advantage already given; and, nor to

4.2 Give, promise to give, or offer, either directly or through a third party, a payment, gift or hospitality (or other thing of value) to a public official or representative with the expectation or hope that a business advantage will be received. This prohibition applies regardless of whether this is to facilitate or expedite a routine procedure.

5. Entertainment, hospitality, gifts, and charitable donations

Alumasc does not permit any officer or employee of Alumasc, directly or indirectly, and whether in his/her personal capacity or on behalf of Alumasc to:

- solicit any gift or hospitality in the course of his/her employment;
- give or promise to give, or offer, a charitable donation or sponsorship with the expectation that a business advantage will be improperly received;
- to offer or give to, or receive from, any Connected Person any gifts or hospitality outside the limits set within the Gifts and Hospitality Policy; and
- to offer, give, or receive any gift or hospitality which is in breach of the applicable law or in respect of which it is otherwise wrong for the recipient to receive under the rules of the recipient's employer. Consequently, the law must be checked before any gift or hospitality is offered, given, or received.

Please refer to our Gifts and Hospitality Policy for details of the process and permitted amounts.

6. Sponsorship and charitable donations

We are committed to community support and charitable contribution as part of our ongoing contribution to the communities in which we work.

Alumasc may support local charities or provide sponsorship, for example, to sporting or cultural events. Any such sponsorship must be transparent and properly documented. See our Gifts and Hospitality Policy for the process, procedure and permitted amounts.

7. Political contributions

Alumasc does not grant financial or other support to political parties, political campaign efforts, organisations or individuals engaged in politics as this may be perceived as an attempt to gain an improper business advantage.

If an employee is asked for a political donation in the context of contract discussions, no

such donation should be made, and the matter should be reported to the Group Company Secretary.

8. Facilitation payments

Facilitation payments are prohibited and could be typically small unofficial payments paid to speed up an administrative process or secure a routine government action by an official. They are more common in certain overseas jurisdictions, but they can arise in the UK.

Facilitation payments should be contrasted with official, lawful, receipted payments (typically to an organisation rather than an individual) to expedite certain functions (e.g. where there is a choice of fast track services to obtain a passport).

If you are unsure as to the validity of an official's request for a payment, the steps below should be followed as far as they are applicable and as far as it is possible for you to do so without putting your personal safety or security at risk:

- if possible, contact your line manager or supervisor or Group Company Secretary immediately;
- ask the official for proof of the validity of the fee and request a receipt; and
- at all times remain calm, respectful, and polite.

IF YOU ARE CONCERNED ABOUT YOUR SAFETY OR LOSS OF LIBERTY, YOU NEED TO MAKE THE PAYMENT AND REPORT THE INCIDENT. Always report any demand for payments immediately to the Group Company Secretary.

All unlawful requests are recorded as part of our adequate procedures programme.

9. Whistleblowing and reporting

9.1 If you suspect that any Alumasc employee or others working on our behalf may have or is about to engage in any corrupt or fraudulent conduct, or if you are approached by any other person who attempts to persuade you to engage in any conduct described, then you should report the concern immediately.

9.2 Alumasc will support anyone who raises concerns in good faith. This includes ensuring that no one in our organisation will suffer any detriment for refusing to accept or pay bribes or take part in fraudulent practices, or if they report concerns, they have about others' conduct.

9.3 A deliberate failure to speak up when there was clear evidence of corruption or fraud by others could lead to disciplinary action. Failure to report concerns can result in prohibited activity damaging our business - and may suggest Alumasc or individual employees have been complicit in this behaviour.

9.4 All employees should be assured that reporting of any concerns will be handled sensitively. If you feel more comfortable doing so, you should contact our anonymous Whistleblowing Helpline, telephone number 01536 383812.

9.5 Reporting

This can be either by:

- a) follow your normal whistleblowing reporting channels (see Group Whistleblowing

Policy) or calling the anonymous whistleblowing Helpline on 01536 383812; and/or

b) contact:

- Karen McInerney, Non-executive Director (k.mcinerney@alumasc.co.uk)
mobile: 07801 451708
- Paul Hooper, Chief Executive Officer
- Helen Ashton, the Group Company Secretary (companysecretary@alumasc.co.uk)
directly.

10. Record-keeping

- 10.1** We must keep financial records and have appropriate internal controls in place which evidence the reasons for payments or providing a thing of value, especially to third parties.
- 10.2** Records of Gifts and Hospitality must be recorded in accordance with the Gifts and Hospitality Policy.
- 10.3** Expense claims relating to gifts and hospitality or payments to third parties need to be made in accordance with the expenses policy and record the reason for the expenditure.

