

ANTI-BRIBERY AND CORRUPTION POLICY

Good business ethics are integral to who we are and what we do. Everyone who works for or with a member of Cleveland Cable Company Limited must work in a safe, ethical and lawful manner. We must all strive to be professional and accountable in everything that we do at work. We will not be influenced – we prize our independence and impartiality. This means that we will not seek to influence or be influenced by payments of money or anything of value, corporate hospitality or gifts. It is our policy to conduct all of our business in an honest and ethical manner. We take a zero-tolerance approach to bribery and corruption within Cleveland Cable Company Limited. We are committed to acting professionally, fairly and with integrity in all our business dealings and relationships.

The purpose of this Anti-Bribery and Corruption Policy is to:

- a) Set out our responsibilities, and of those working for us, in observing and upholding our zero-tolerance position on bribery and corruption
- b) Provide information and guidance to those working for us on how to recognise and avoid bribery and corruption.

Note : -

The UK Bribery Act 2010, which came into force on 1 July 2011, made it illegal to give or receive a bribe, bribe a non-UK government official or, as a commercial organisation, fail to prevent bribery. It applies to our conduct everywhere in the organisation. There are similar anti-bribery and corruption laws in many countries around the world. Under English law, bribery and corruption are punishable by up to ten years' imprisonment for individuals and if we are found to have taken part in corruption we could face an unlimited fine, be excluded from tendering for public contracts and face damage to our reputation. In the U.S., the criminal penalties are similarly severe. The US Foreign Corrupt Practices Act of 1977 (FCPA) makes it a crime to give, or to offer to give, anything of value to non-US government officials (including employees of state owned companies, such as national oil or transportation companies) to improperly influence the performance of the officials' duties. A single violation of bribery under U.S. law could cost a company up to US\$2M in fines and, for individuals, up to 5 years' imprisonment and fines of up to US\$100K per violation. In some countries in the Asia Pacific region, bribery and corruption attracts punishment of life imprisonment, or even in the most serious cases, the death penalty. We therefore take our legal responsibilities very seriously. It is your responsibility to comply with this policy and raise any concerns regarding bribery or corruption with Jan Robson as soon as possible.)

It is the policy of Cleveland Cable Company Limited to maintain ethical conduct and continue to strengthen the company and its employees' reputation for independence and honest dealing with all those we come into contact with.



Alastair Powell
Managing Director

04 January 2023