
Cetix Limited

Anti Bribery & Corruption Policy

1. POLICY STATEMENT

Cetix will not tolerate any form of bribery or corruption in connection with its business activities.

Bribery and corruption are illegal and would be likely to have a negative effect on Cetix business and reputation. Bribery and corrupt practices are not consistent with the honest and ethical stance of the group, company owners and management.

Any evidence of bribery and corruption shall be investigated through appropriate disciplinary proceedings. Any deliberate corrupt activity or bribery, directly by an employee or indirectly through any agent or other party, is very likely to be regarded as a gross misdemeanour resulting in dismissal of the employee. In addition, civil legal proceedings shall be considered in respect of financial or reputational damages.

All Employees must follow the anti-bribery and corruption laws to which they and Cetix are subject. It is illegal to offer, promise, give, request, agree, receive or accept bribes. As a UK business, the Bribery Act 2010 applies wherever in the world business may be conducted by Cetix, in addition to the laws of the relevant territory.

Employees including management at all levels must not offer, pay, make, seek or accept a personal payment, gift or favour in return for favourable treatment or to gain any business advantage.

The greatest risks to the business are in conducting business with customers and suppliers, where there will be a future financial transaction. Suppliers may attempt to influence Cetix decision-makers in inappropriate ways. While Cetix employees could be tempted to improperly convince a Customer to favour Cetix.

There are two inter-linked key classes of risk for businesses: Corruption is mainly focussed on attempts by an individual to benefit themselves directly, perhaps by offering business favours, or a share of financial gain. Bribery is generally targeted at unfair persuasion, by means of money, gifts or other benefits of an individual in another organisation, in ways which benefit the business.

The primary means of managing such risks within Cetix is transparency. All transactions, spending decisions and sales activity is visible and subject to review and oversight by others.

The remainder of this document considers the specific risks for Cetix and provides further guidance.

Lawrence Franklin Signed:
Cetix Limited Managing Director

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LAWRENCE FRANKLIN*

Date: 26¹ 22