



## POLICY: SMS520 Anti-bribery & Corruption

REVISION RECORD				
REV	DATE	DESCRIPTION OF REVISION	PREPARED BY	AUTHORISED BY
G	07-10-2024	Full review and template update	Andy Oakes	Shaun Tolfree

### POLICY STATEMENT

#### Scope

This policy applies to Sanctus Limited and every employee (which for these purposes includes temporary or contract employees).

In addition, it is very important that employees take steps to ensure that the terms of this policy are complied with by third party service suppliers (which for these purposes includes consultants, sub-contractors and suppliers).

#### Policy

Sanctus Limited does not engage in or tolerate any form of bribery or corruption. It is contrary to the Company's policy for any employee or third party acting on behalf of Sanctus to engage in any conduct which may constitute bribery or corruption.

Bribery or corruption can be defined as the offering, promising, giving, accepting or soliciting of an advantage as an inducement for an action which is illegal or a breach of trust. Bribery generally involves paying or offering to pay money or something of value to someone in business or in the public sector in order to obtain or retain a commercial advantage or to induce or reward the recipient for acting improperly. Corruption can also take place where the offer or payment is made by or through a third party.

Sanctus prohibits employees (whether acting in their own capacity or on the Company's behalf) from:

- Offering, promising, giving, paying or authorising, directly or indirectly, any bribe, facilitation payments or other kickbacks to or for the benefit of any person in order to obtain any improper business advantage or other advantage for the Company or themselves or any of their connected persons



- Soliciting, accepting or receiving (whether for the Company's benefit, their own benefit or the benefit of any connected persons) any bribe, facilitation payments or other kickbacks from any person in return for any improper business or other advantage
- Otherwise using illegal, unethical or improper means (including bribes, favours, blackmail, financial payments, inducements, secret commissions or other rewards) to influence the actions of others (whether in private or public office)
- Acting as an intermediary for any third party (private or public) in the solicitation, acceptance, receipt, offering, promising, giving, paying or authorising of any bribe, facilitation payments or other kickbacks or otherwise in the use of illegal, unethical and improper means to influence the actions of others (whether in private or public office)

Sanctus will not authorise or be a party to any illegal, unethical or improper payments or benefits in kind in circumstances where a third party could reasonably perceive that their purpose is to win or retain business, to influence business decisions, or to secure the improper performance of a recipient's duties.

Sanctus requires that its employees comply with the specific prohibitions in this policy and exercise common sense and judgment, having regard to the guidance in this policy, in assessing whether any conduct or arrangement could be perceived to constitute bribery, corruption or otherwise inappropriate conduct.

If any employee has any concerns regarding any form of proposed conduct or arrangement which they are asked to participate in or otherwise exposed to, they must seek further guidance from the Managing Director, Shaun Tolfree.

### **Responsibilities**

The Managing Director is responsible for establishing appropriate responsibilities, procedures, training and internal controls to ensure the consistent implementation of this policy.

It is the responsibility of each Sanctus employee to ensure compliance with the terms of this policy.

### **Compliance**

All employees are required to comply with this policy.

The Company is committed to training its employees in relation to anti-corruption and bribery issues and the procedures and controls implemented in accordance with the requirements of this policy.

Failure to comply with this policy may result in disciplinary action.

Employees must co-operate fully and openly with any investigation by the Company into alleged or suspected breaches of this policy. Failure to co-operate or to provide truthful information during any investigation may lead to employees being subject to disciplinary action, which may lead to dismissal.



## Monitoring

The Company is committed to monitoring compliance with this policy.

Monitoring of compliance with this policy will include reviewing the nature and extent of payments made to or received from third parties, reviewing the assessment of bribery and corruption risks, and the implementation of compliance requirements such as training and certifications.

Reviewed & Signed, for and on behalf of  
Sanctus Ltd:

A handwritten signature in blue ink, appearing to read "Shaun Tolfree", written in a cursive style.

Shaun Tolfree – 07/10/2024