



STC Maintenance

ANTI-BRIBERY AND CORRUPTION POLICY

Introduction

STC Maintenance (the Company) is committed to ensuring that its business is conducted according to ethical, professional and legal standards in a fair, honest and open manner. We will endeavour to ensure that this is reflected in every aspect of business that we undertake, so that we bring integrity to all our dealings.

Bribery and corruption expose the Company, its employees and business partners to the risk of criminal prosecution in addition to harming the Company's reputation. Accordingly, the Company operates a zero tolerance of all forms of bribery and corruption. It is vital that we ensure that our employees and those who work on our behalf understand their responsibilities and operate to high ethical standards.

What is Bribery?

A bribe is an inducement or reward which is offered, promised or provided in order to gain improperly any commercial, contractual, regulatory or personal advantage. Bribery is a criminal offence.

Bribery and corruption can take many forms. It is not possible to provide an exhaustive list of examples which may be made directly or indirectly through a third party. However some examples may include:

- The direct or indirect promise, offering or authorisation of anything of value.

- The offer or receipt of any kickback, loan, fee, reward or other advantage.
- The giving of aid, donations or voting designed to exert improper influence.
- Payments for lavish or inappropriate entertainment or travel.
- Favours including offers of employment.
- Facilitation payments.
- Inflated commissions.
- Fake consultancy agreements.

"Anything of value" includes cash, gifts, travel expenses, entertainment, offers of employment, provision of free services, and business meals. It may also include event sponsorships, consultant contracts, fellowship support and charitable contributions made at the request of, or for the benefit of, an individual, his or her family, or other relations, even if made to a legitimate charity.

What are Kickbacks and Facilitation Payments?

Kickbacks are typically payments made in return for a business favour or advantage. Kickbacks usually involve the return of a percentage of a sum of money already requested or received, typically as a result of pressure, coercion or a secret agreement. A kickback can be initiated and received by a corrupt individual, usually simultaneously with or after the completion of a business transaction.

Facilitation payments are typically small, unofficial payments made to secure or expedite or facilitate a routine government or administrative

action by a government official. They are not commonly paid in the UK but are common in some other jurisdictions.

Our Principles

The Company opposes all forms of bribery and corruption, large as well as small, whether initiated by corrupt officials or corrupt companies or individuals.

The Company prohibits the offer, gift or acceptance of a bribe in any form, including kickbacks on any portion of a contract payment, facilitation payments or the use of other routes or channels to provide improper benefits to customers, agents, contractors, suppliers or employees of any such party.

The Company also prohibits any Company Personnel or business partner from arranging or accepting a bribe, facilitation payment or kickback from customers, agents, contractors, suppliers, or employees of any such party, for their own benefit or that of their family, friends, associates or acquaintances.

Company Personnel must avoid any activity that might lead to, or suggest, that a facilitation payment or kickback will be made or accepted by the Company.

All Company Personnel have been instructed that, if they are confronted with a request or demand for an improper payment or other violation of the Company's policy, the request or demand must be immediately rejected and reported to the board of directors of the Company.

Company Personnel shall comply with all internal procedures notified to them from time to time governing the award of material contracts to suppliers of goods or services to the Company. These procedures will include such safeguards as may be imposed from time to time to ensure adequate transparency around the commercial terms on which goods and services are supplied and, where appropriate, the benchmarking of those terms.

This policy has been formally adopted by the Board of STC Maintenance Ltd which is committed to preventing bribery and corruption. Its aim is to establish a culture within the Company and

with our business partners in which bribery and corruption are never acceptable.

It is the Board's ultimate responsibility to oversee the development and implementation of the Company's Anti-Bribery and Corruption programme to ensure its effective implementation throughout the Company to employees, associated companies and business partners.

Gifts and Hospitality

Giving and receiving ordinary and usual business hospitality and entertainment and promotional or other business expenditure which seeks to improve the image of the Company and its services or to establish or cement cordial relations is recognised as an established part of doing business.

This Company's policy does not prohibit reasonable and proportionate hospitality and promotional or other similar business expenditure (offered or received) intended for any of the foregoing purposes.

The policy does prohibit the offer or receipt of gifts, hospitality or expenses whenever they could influence or be perceived to be capable of influencing the outcome of a contractual or material business transaction. This may be the case if timed around particular business decisions.

Employees' responsibility

The prevention, detection and reporting of bribery is the responsibility of all employees and the Company is committed to:-

- Encouraging employees to be vigilant and to report any suspicion of bribery.
- Providing employees with suitable channels of communication and ensuring that sensitive information is treated appropriately.

- Investigating instances of alleged bribery and assisting the police and other appropriate authorities in any resultant prosecution.
- Taking disciplinary action against any individual(s) involved in bribery.

Monitoring and Review

It is the ultimate responsibility of the Board to routinely refresh and reinforce this policy and its underlying principles and guidelines as to its adequacy and effectiveness.

Conclusion

All staff are responsible for the success of this policy and should ensure they use it to disclose any suspected concerns or wrongdoing to the HR Manager or any Board Director.

Failure to comply with this policy may result in disciplinary action, including dismissal (employees), or appropriate sanctions (business partners) in addition to civil or criminal charges.

This policy has been approved and adopted by the Board of STC Maintenance Ltd.



A. M. Fox

Andrew Fox, Chief Executive, STC Maintenance August 2021