

WILLIAM HARE GROUP LIMITED ANTI-CORRUPTION POLICY

Introduction

William Hare Group Limited and its group of companies (the Group) is committed to complying with anti-corruption law in the United Kingdom and elsewhere and implementing and enforcing effective systems to counter bribery and corruption. Therefore, it is the Group's policy to conduct all aspects of its business in an honest and ethical manner at all times.

Violation of anti-corruption laws in the UK or overseas could subject the Group to severe legal penalties including fines and imprisonment. It could also be damaging to the Group's business and reputation.

This policy applies to all employees, directors or officers of the Group, consultants, agents or sub- contractors and other third parties working for or on behalf of the Group.

The aim of this policy is to ensure awareness of the requirements of the legislation and also to provide help and guidance where necessary so that the Group acts in accordance with relevant anti-corruption legislation in all locations where it does business and accordingly maintains the highest possible standards of business practice.

Understanding and being aware of the issues

Bribery and corruption are criminal offences in the European Union, USA, UAE, Singapore, India and most other countries where the Group does business and the penalties could be severe for both the individuals involved and the Group.

- **Bribery** is a financial or other advantage that is offered, promised, solicited, given to or accepted from anyone with the intention to persuade them to or reward them for performing their duties improperly
- **Corruption** is illegal or dishonest behaviour, especially by people in positions of power
- **Facilitation payments** are payments made in return for a business favour or advantage.

In addition to the offence of individuals bribing another person, in the UK the Group may be held liable for failing to prevent bribery committed on its behalf. This applies to activities both inside and outside the UK.

Accordingly the Group requires that all act in accordance with standards that match those of the Group and to do so at all times.

Our approach to these matters involves acting as follows:-

- Not participating in any Bribery or Corruption or Facilitation Payments.
- Informing all third parties that it is proposed the Group do business with of the Group's anti- bribery and anti-corruption policy.
- Carry out appropriate due diligence on all third parties who it is proposed to enter into a business relationship with on the Group's behalf.
- When entering into any business arrangement, follow the Group's commercial and legal policies for placing of sub-contracts/agency/consultant appointments/purchase orders.
- Keep appropriate internal records.
- Never use company funds or property in the form of payments or gifts for any unlawful, unethical or improper purpose.
- Never make any payments or other inducement to obtain a personal advantage or for the Group in any way which is deemed unethical or permit others to do so on behalf of the Group.
- Never offer or give anything to a public official in order to obtain any regulatory advantage which is to induce or reward them for acting improperly.

- Do not make, or accept, facilitation payments of any kind.
- Only offer and accept appropriate and normal hospitality providing it is agreed in advance with a line manager.
- Only offer or accept gifts of reasonable value in accordance with the Group's Corporate Hospitality and Entertainment Policy.
- Ask for advice from a line manager or the Group's Compliance Officer, HR or legal department if unsure or there are concerns about any issue so that any possible suspicion of malpractice is raised at the earliest possible stage.

All employees are responsible for making sure that the Group's business dealings are conducted in accordance with this Policy.



Susan Hodgkiss
Chief Executive Officer
for and on behalf of William Hare Group Limited

Dated: 14th July 2021