

Introduction

We are committed to the practice of responsible behaviour and to complying with all laws, regulations and other requirements which govern the conduct of our operators.



It is important to us that we instil a strong anti-corruption culture and we are fully committed to compliance with all anti-bribery and anti-corruption legislation including, but not limited to, the Bribery Act 2010 (“the Act”) and we ensure no bribes or other corrupt payments, inducements or similar are made, offered, sought or obtained by us, any of our employees or anyone else working on our behalf. We rely upon our employees to have our best interests at heart, and to be constantly alert to these challenges that can occur, and if observed reporting them to senior management, so that it can be dealt with.

A few important definitions:

- Bribery is defined as the giving or promising of a financial or other advantage to another party where that advantage is intended to induce the other party to perform a particular function improperly, to reward them for the same or where the acceptance of that advantage is in itself improper conduct.
- Bribery is also deemed to take place if any party requests or agrees to receive a financial or other advantage from another party, where that advantage is intended to induce that party to perform a particular function improperly, where the acceptance of that advantage is in itself improper conduct, or where that party acts improperly in anticipation of such advantage.
- Bribery of a foreign official is defined as the giving or promising of a financial or other advantage which is intended to influence the official in order to obtain business or an advantage in the conduct of business unless the foreign official is required or permitted by law to be influenced by such advantage.

Consequences of Bribery

Anyone or any organisation found guilty of bribery under the Act may face fines and/or prison terms. In addition, high legal costs and adverse publicity are likely to result from any breach of the Act.

For our people, if you fail to comply with this policy and/or with the Act, it's important that we explain to you that your actions may result in:

- Disciplinary action which may include dismissal
- Criminal penalties under the Act which may result in a fine and/or imprisonment for up to 10 years

We treat this very seriously not only because it's the right thing to do, but also because the consequences for the company and therefore all colleagues' future employment, of any breach of the Act by anyone working here or business associate may result in:

- The company being deemed to be in breach of the Act
- The company being subject to fines
- The company suffering negative publicity and further associated damage as a result of such breach

You need to comply with this

This Act and how we apply it, detailed in this policy, applies to everyone employed by the company, agents, contractors, subcontractors, consultants, business partners and any other parties (including individuals, partnerships and corporate bodies) associated with the company.

It is the responsibility of everyone mentioned above to ensure that bribery is prevented, detected and reported and all such reports should be made in accordance with the Whistleblowing procedure.



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What you must not do

- Give or promise any financial or other advantage to another party (or use a third party to do the same) on the company's behalf where that advantage is intended to induce the other party to perform a particular function improperly, to reward them for the same, or where the acceptance of that advantage will in itself constitute improper conduct
- Request or agree to receive any financial or other advantage to give to another party where that advantage is intended to induce the improper performance of a particular function, where the acceptance of that advantage will in itself constitute improper conduct, or where the recipient intends to act improperly in anticipation of such an advantage

Instead we expect that you:

- Be aware and alert at all times of all bribery risks as described here and in particular as set out in the risk section below
- Be alert at all times when dealing with third parties on behalf of the company, checking data and information
- Report any and all concerns relating to bribery to the company director or in the case of non-employees, their normal point of contact within the company, or otherwise in accordance with the Whistleblowing procedure

Gifts and hospitality

Gifts and hospitality remain a legitimate part of conducting business, however, be aware that they can, when excessive, constitute a bribe and/or a conflict of interest.

You need to exercise care and due diligence when giving or receiving any form of gift or hospitality on behalf of the company.

To help guide you follow the principles below:

- Gifts and hospitality may neither be given nor received as rewards, inducements or encouragement for preferential treatment or inappropriate or dishonest conduct
- Neither gifts nor hospitality should be actively sought or encouraged from any party, nor should the impression be given that the award of any business, custom, contract or similar will be in any way conditional on gifts or hospitality
- Cash should be neither given nor received as a gift, under any circumstances
- Gifts and Hospitality to or from relevant parties should be generally avoided at the time of contracts being tendered or awarded
- The value of all gifts and hospitality, whether given or received should be proportionate to the matter to which they relate and should not be unusually high or generous when compared to prevailing practices in our industry or sector
- Certain gifts which would otherwise be in breach of this may be accepted if refusal would cause significant and/or cultural offence, however the company will donate any gifts accepted for such reasons to a charity of the directors choosing
- All gifts and hospitality, whether given or received must be recorded in the Gifts and Hospitality register (POL50)

Charitable donations

Charitable donations are permitted only to registered (non-profit) charities. No charitable donations may be given to any organisation which is not a registered charity.

All charitable donations must be fully recorded in the Gifts and Hospitality register (POL50).

Proof of receipt of all charitable donations must be obtained from the recipient organisation.

Under no circumstances may charitable donations be made in cash.

No charitable donation may be made at the request of any party where that donation may result in improper conduct.



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Political donations

We don't make political donations, and the company is not affiliated with any political party, independent candidate or with any other organisation whose activities are primarily political.

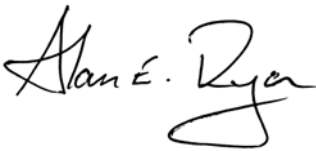
You and other associated parties are free to make personal donations provided such payments are not purported to be made on behalf of the company and are not made to obtain any form of advantage in any business transaction.

We see the below as risks to our business and so if you come across anything like this, ensure you gain authorisation from a director prior to proceeding:

- Territorial risks, particularly the prevalence of bribery and corruption in a particular country
- Cross-border payments
- Requests for cash payment, payment through intermediaries or other unusual methods of payment
- Activities requiring the company and/or any associated party to obtain permits or other forms of official authorisation
- Posting images that are discriminatory or offensive links to such content
- Transactions involving the import or export of goods
- Improper conduct, or where the recipient intends to act improperly in anticipation of such advantage

This policy applies to all employees and will be reviewed by Technoprint Senior Management each year. It is available to view on our website.

Signed:



Alan Ryan

Managing Director

Employee commitment

I agree to follow the Technoprint Corruption and Bribery policy

Signed: _____

Date: _____

