

Anti-Bribery Policy

What is not acceptable?

It is not acceptable for you (or someone on your behalf) to:

- Give, promise to give, or offer, a payment, gift or hospitality with the expectation or hope that a business advantage will be received, or to reward a business advantage already given;
- Give, promise to give, or offer, a payment, gift or hospitality to a government official, agent or representative to “facilitate” or expedite a routine procedure;
- Accept payment from a third party that you know or suspect is offered with the expectation that it will obtain a business advantage for them;
- Accept a gift or hospitality from a third party if you know or suspect that it is offered or provided with an expectation that a business advantage will be provided by us in return;
- Threaten or retaliate against another employee or person working on behalf of or representing the Company who has refused to commit a bribery offence or who has raised concerns under this policy; or
- Engage in any activity that might lead to a breach of this policy.

Facilitation Payments and Kickbacks

The Company does not condone facilitation payments or “kickbacks” of any kind. Facilitation payments are typically small, unofficial payments made to secure or expedite a routine government action by a government official. Kickbacks are typically payments made in return for a business favour or advantage.

You must avoid any activity that might lead to, or suggest, that a facilitation payment or kickback will be made or accepted. You should always ask for an invoice or a receipt which details the reason for the payment.

Donations

We do not make contributions to political parties. We only make charitable donations that are legal and ethical under established laws and practices.

Reporting

The prevention, detection and reporting of bribery and other forms of corruption are the responsibility of all those working for the group or under our control. All employees and other representatives are required to avoid any activity that might lead to, or suggest, a

breach of this policy. You must notify your line manager as soon as possible if you believe or suspect that a conflict with this policy has occurred, or may occur in the future,

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for gross misconduct.

Record Keeping

The Company keeps financial records and has appropriate internal controls in place to evidence the business reason for making payments to third parties. Accordingly, you must ensure that all expense claims relating to hospitality or gifts incurred by you on behalf of the Company for the benefit of a third party are submitted in accordance with our expenses policy and specifically record the reason for the expenditure.

In addition, you must declare and keep written record of all hospitality accepted, whether in excess of £250 or not, as well as any gifts received with a financial value perceived to be in excess of £25.

How to Raise a Concern

You are encouraged to raise concerns about any issue or suspicion of corruption at the earliest possible stage. If you are unsure whether a particular act constitutes bribery or corruption, or if you have any other queries, you should raise them with your line manager.

Protection

Employees or those who are acting on behalf of the Company who refuse to accept or offer a bribe, or those who raise concerns or report another's wrongdoing are sometimes worried about possible repercussions.

The Company encourages openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. The Company is committed to ensuring no one suffers any detrimental treatment as a result of refusing to take part in bribery or corruption, or because of reporting in good faith their suspicion that an actual or potential bribery or other corruption offence has taken place, or may take place in the future.

Training

Training on this policy should form part of the induction process for all new employees. All existing employees will receive regular, relevant updates on how to implement and adhere to this policy.

Appendix – Potential Risk Scenarios or “Red Flags”

The following is a list of possible red flags that may arise during the course of you working for us and which may raise concerns under various anti-bribery and anti-corruption laws. The list is not intended to be exhaustive and is for illustrative purposes only.

If you encounter any of these red flags while working for us you must report them promptly using the procedure set out above:

- You become aware that a third party engages in, or has been accused of engaging in, improper business practices;
- You learn that a third party has a reputation for paying bribes, or requiring that bribes are paid to them, or has a reputation for having a “special relationship” with foreign government officials;
- A third party insists on receiving a commission or fee payment before committing to sign up to a contract with us, or carrying out a government function or process for us;
- A third party requests payment in cash and/or refuses to sign a formal commission or fee agreement, or to provide an invoice or receipt for a payment made;
- A third party requests that payment is made to a country or geographic location different from where the third party resides or conducts business;
- A third party requests an unexpected additional fee or commission to “facilitate” a service;
- A third party demands lavish entertainment or gifts before commencing or continuing contractual negotiations or provision of services;
- A third party requests that a payment is made to “overlook” potential legal violations;
- A third party requests that you provide employment or some other advantage to a friend or relative;
- You receive an invoice from a third party that appears to be non-standard or customised;
- A third party insists on the use of side letters or refuses to put terms agreed in writing;
- You notice that we have been invoiced for a commission or fee payment that appears large given the service stated to have been provided;
- A third party requests or requires the use of an agent, intermediary, consultant, distributor or supplier that is not typically used by or known to us; or
- You are offered an unusually generous gift or offered lavish hospitality by a third party.

Responsibility for this Policy

The Company's Board of Directors have approved and issued this policy as part of its overall responsibility for ensuring the group complies with its legal and ethical obligation, and that all those under the Company's control comply with it.

Management at all levels are responsible for ensuring those reporting to them are made aware of and understand this policy, and are given adequate and regular training on it. Our zero-tolerance approach to bribery and corruption must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and as appropriate thereafter.

Monitoring and Review

Our Finance Director will monitor the effectiveness and review the implementation of this policy regularly, and will report to the Board of Directors on its suitability, adequacy and effectiveness. Any improvements identified by the Board of Directors will be made as soon as possible.

Employees and those who are acting for or on behalf of the Company are invited to comment on this policy and suggest ways in which it might be improved.

Approval by the Directors

This statement is made pursuant to section 54 (1) of the Modern Slavery Act 2015 and has been approved by The Lodge Tyre Company Ltd Board of Directors.