ANTI-BRIBERY POLICY 2021

This policy does not form part of your contract of employment and may be amended from time to time.

The Company is committed to fair, honest and open business practices and has a zero-tolerance policy towards bribery.

Any form of inducement such as offering or receiving a bribe which results in personal gain or advantage to the individual or another party or organisation, or which is intended to influence, is prohibited. This includes the bribing or attempted bribery of a foreign public official, with the intention of obtaining or retaining business.

Introduction

Everyone is responsible for the prevention, detection and reporting of bribery. You must report any suspicion of bribery either to your line manager or you may choose to follow the Whistleblowing Policy, a copy of which is displayed on your notice board and on the Company's intranet. Further copies may be obtained from the Company Secretary.

Purpose of Policy

The purpose of this policy is to serve as a guide for all staff. It explains the steps needed to be followed in order to ensure the Company maintains its values, adheres to corporate responsibility, social and legal expectations.

Policy

You must not, directly or indirectly:

- Offer, give, solicit or accept any bribe, either in cash or any other form of inducement, to or from any person or company, wherever they are located and whether they are a public official or private person or company.
- Gain any commercial, contractual or regulatory advantage for the Company in a way which is unethical.

Responsibility

This policy applies to all members of staff, regardless of seniority.

Gifts and Hospitality

Gifts and hospitality can, when excessive, constitute a bribe and/or conflict of interest. The value of all gifts and hospitality should not be unusually high or generous when compared to prevailing practices in our industry. They should be generally avoided at the time of contracts being tendered or awarded. All gifts and hospitality must be recorded in a register for this purpose.

Gifts

- Except for gifts of low value and which are mere tokens (such as promotional pens, calendars and stationary), employees are not permitted to accept any gifts from customers, suppliers or third parties involved with the Company.
- Where refusing a gift could cause offence or embarrassment, the gift may be accepted and donated to a charity of the Company's choice.
- Approval must be sought from the SCM/General Manager or equivalent before accepting any gift
- Cash should not be given or received as a gift under any circumstances.

ANTI-BRIBERY POLICY 2021

Hospitality

'Corporate Hospitality' is defined here as any form of accommodation, entertainment or other hospitality provided for an employee solely due to his position as a representative of the Company. The following are not considered Corporate Hospitality and don't require any approval:

- Normal working lunches or refreshments provided during a business visit.
- Hospitality provided at a company approved seminar or industry events such as metal association annual dinners, golf days, so long as the hospitality is extended to all attendees.
- Free seminars, talks or workshops, provided they are free to all attending.

All other forms of Corporate Hospitality require approval from the SCM/General Manager or equivalent before acceptance.

Remember that market practice varies between countries and what is normal and acceptable in one place may not be in another.

If you are in doubt about the appropriateness of a gift or hospitality, please refer the matter to the Company Secretary.

Breach of Policy

The Company will investigate seriously any actual or suspected breach of this policy or the spirit of this policy. Staff may be subject to a disciplinary action which may ultimately result in their dismissal. In the case of the third parties found to be bribing or attempting to bribe our workforce, a senior officer, a supplier or customer, they will be informed in writing that business dealings will be ceased and appropriate authorities informed.

Reviewed September 2021