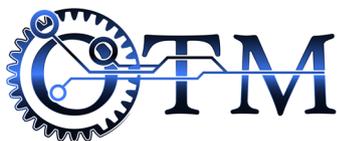


## Anti-Bribery and Anti-Corruption Policy

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## **1. What Does the Policy Cover?**

- 1.1 This document represents the OTM Servo Mechanism limited formal anti-bribery and anti-corruption policy (hereafter 'the policy').
- 1.2 The policy aims to clearly set out the responsibilities of the company and of those who work for us (hereafter 'individuals') in relation to observing and upholding our zero-tolerance position towards bribery and corruption.
- 1.3 The policy acts both as source of information and guidance for individuals and helps them recognise any instances of bribery and/or corruption, and to understand their responsibilities.

## **2. Policy Statement**

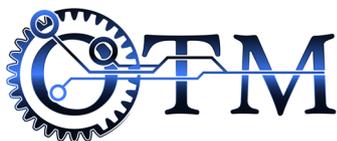
- 2.1 The Company is fully committed to conducting business in an ethical and honest manner and to implementing and enforcing systems that ensure bribery is prevented.
- 2.2 The Company operates a zero-tolerance policy towards bribery or any other corrupt activities and is committed to acting professionally, fairly and with integrity in all business dealings and relationships, wherever we operate.
- 2.3 The company will constantly uphold all laws relating anti-bribery and corruption and is bound by laws governing the UK, including the Bribery Act 2010 which relates to our conduct both domestically and overseas.
- 2.4 The company recognises that bribery and corruption are punishable by up to ten years' imprisonment and a fine if it (or any of its representatives) is discovered to have taken part in any corrupt activities. It is with that in mind that we commit to preventing bribery and corruption in our business and to take our legal responsibilities seriously

## **3. Who is covered by the Policy?**

- 3.1 The policy applies to all employees (whether temporary, fixed term or permanent), consultants, contractors, trainees, apprentices, casual workers, agency staff, volunteers, agents, sponsors and anyone else associated with the group (including third parties). This also covers any of our subsidiaries or their employees, regardless of where they are located.
- 3.2 In the context of the policy, 'third party' refers to any individual or organisation that our company meets and works with, it refers to actual and any potential clients, customers, suppliers, business contacts, agents, advisors and any governmental or public policies.
- 3.3 Any arrangements our company makes with a third party is subject to claim contractual terms, including specific provisions that require the third party to comply with minimum standards and procedures relating to anti-bribery and corruption.

## **4. Definition of Bribery**

- 4.1 Bribery refers to the act of offering, giving, promising, asking, agreeing, receiving, accepting, or soliciting something of value or of an advantage so as to induce or influence an action of decision.
- 4.2 A bribe refers to any inducement, rewards or objects or items of value or offered to another individual, in order to gain a commercial, contractual, regulatory or personal advantage.
- 4.3 Bribery is not limited to the act of offering a bribe, if any individual is found to have received a bribe they are also in breach of the law.
- 4.4 Bribery is illegal, individuals must not engage in any form of bribery, they must not accept bribes in any form
- 4.5 If uncertain about whether something is a bribe or a gift or an act of hospitality then individuals must seek advice from your manager.



## 5. What is not acceptable

This section of the policy refers to 4 areas:

- Gifts and hospitality
- Facilitation Payments
- Political Contributions
- Charitable Contributions

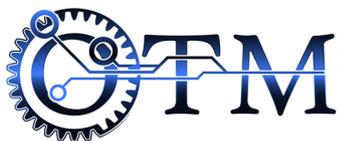
### 5.1 Gifts and Hospitality

The company accepts normal and appropriate gestures of hospitality and goodwill (whether given to / received from third parties) provided the giving or receiving of these gifts meets the following requirements:

- a) It is not made with the intention of influencing the party to whom it is being given, to obtain or reward the retention of a business or a business advantage, or as an explicit or implicit exchange for favours or benefits.
- b) It is not made with the suggestion (or expectation) that a return favour is expected.
- c) It is in compliance with the law
- d) It is given to the name of the company, not in an individual's name.
- e) It does not include cash or a cash equivalent (e.g. a voucher or a gift certificate)
- f) It is appropriate for the circumstances (e.g. the giving of a small gift around Christmas)
- g) It is of an appropriate type and value and given at an appropriate time taking into account the reason for the gift.
- h) It is given/received openly
- i) It is not selectively given to a key influential person with the intention of directly influencing them
- j) It is not above a certain excessive value as pre-determined by the General Manager (usually in excess of £50)
- k) It is not offered to, or accepted from a government office or representative, or a politician or a political party without the prior approval of the General Manager

### 5.2 Facilitation Payments and Kickbacks

- 5.2.1 The company does not accept and will not make any form of facilitation payments of any nature and recognises that facilitation payments are a form of bribery that involves expediting or facilitating the performance of a public official or a routine governmental action.
- 5.2.2 The company does not allow kickbacks to be made or accepted and recognise that kickbacks are typically made in exchange for a business favour or advantage.
- 5.2.3 The company Recognises that despite our strict policy employees may face a situation that whilst avoiding facilitation payments or kickbacks may put them in a risk situation and under the circumstances the following steps should be taken:
  - a) Keep any amount to a minimum
  - b) Create a record concerning payments
  - c) Report any incidences to your manager



### 5.3 Political Contributions

- 5.3.1 OTM Servo Mechanism Limited will not make donations, whether in cash or by any other means to support any political parties or candidates as we recognise that this may be perceived as an attempt to gain an improper business /competitive advantage.

### 5.4 Charitable Contributions

- 5.4.1 OTM Servo Mechanism Limited accepts and encourages the act of donating to charities and agrees to disclose all charitable contributions it makes.
- 5.4.2 Employees must be careful to ensure that charitable contributions are not used to facilitate and conceal acts of bribery.

## 6. Employees Responsibilities

- 6.1 As an employee of OTM Servo Mechanism Limited you must ensure you read, understand and comply with the information given within this document.
- 6.2 All employees and those under their control are equally responsible for the prevention, detection and reporting of bribery or any form of corruption.
- 6.3 If for any reason, you believe or suspect any form of bribery or corruption has or will occur, you must notify your manager, at the earliest possible opportunity.
- 6.4 Any employee who breaches this policy will face disciplinary action.

## 7. What happens if I need to raise a concern?

This section concerns 3 areas:

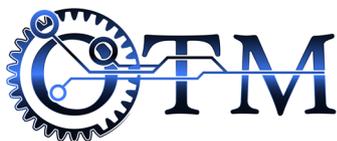
- How to raise a concern
- What to do if you are a victim of bribery or corruption
- Protection

### 7.1 How to raise a concern

- 7.1.1 If you suspect that there is an instance of bribery or corruption activities accruing in relation to the group you **must** raise these concerns at the earliest possible opportunity
- 7.1.2 OTM will familiarise all employees with its whistle blowing procedure so all employees can vocalise any concerns safely and confidentially

### 7.2 What must you do if you're a victim of bribery or corruption

- 7.2.1 You must inform your immediate supervisor as soon as possible if you are offered a bribe by anyone or if you are asked to make one, alternately the same applies if you believe you are the victim of any other corrupt activity



### 7.3 Protection

- 7.3.1 If you have refused to accept a bribe or refused to offer a bribe OTM understands that you may feel worried about potential repercussions, therefore we will (endeavour to) support anyone who raises any concerns under this policy.
- 7.3.2 OTM will ensure that nobody will suffer any detrimental treatment as a result of refusing to accept or offer a bribe or partake in other corrupt activities, or because they have reported a concern relating to potential act(s) of bribery or corruption.
- 7.3.3 Detrimental treatment refers to dismissal, disciplinary action or any unfavourable treatment in relation to the concern the individual raised.
- 7.3.4 If you have any reason to believe you've been subjected to unjust treatment due to a refusal to offer or accept a bribe, you should inform your direct supervisor immediately, or if they are unavailable one of the management team.

## 8. Training and Communication

- 8.1 The Company will provide training on this policy as part of the induction process for all new employees
- 8.2 The Company's anti-bribery and anti-corruption policy, along with the companies zero tolerance attitude will be communicated to all suppliers, contractors, business partners and any third parties at the outset of business relations.

## 9. Record Keeping

- 9.1 OTM will keep detailed records and ensure detailed controls (control mechanisms) are in place to act as evidence for all payments made.

## 10. Monitoring and Reviewing

- 10.1 All managers are responsible for monitoring the effectiveness of this policy and review on a regular basis.
- 10.2 Any need for improvements will be applied as soon as possible, all employees are encouraged to offer their feedback on this policy if they have any suggestions for how it may be improved.
- 10.3 This policy does not form part of an employee's contract of employment as OTM may amend it at any time to improve its effectiveness at combating bribery and corruption.

Steve Johnson  
Reviewed 02/03/2022