

# AMTICO INTERNATIONAL GROUP BRIBERY, CORRUPTION, GIFTS AND HOSPITALITY POLICY

## 1. Introduction

We recognise that giving and accepting gifts can be part of building normal business relationships. In different geographical locations, this practice can vary significantly, often depending on local laws and specific customs. But some gifts and hospitality can create improper influence and conflicts of interest. In some instances they can be viewed as inducements that could damage Amtico International's reputation or even break laws including the UK Bribery Act 2010, the US Foreign Corrupt Practices Act 1977 or the Criminal Finances Act 2017.

## 2. Purpose

The purpose of this policy is to set out the responsibilities of employees and business units in observing and upholding our position on bribery, corruption and the giving and acceptance of gifts and hospitality. In developing this policy reference has been made to relevant laws.

## 3. Scope

This policy applies to Amtico International (Amtico) employees and extends to all our business dealings and transactions in all countries in which we or our subsidiaries operate.

## 4. Policy

We have an obligation to operate responsibly wherever we work in the world and to engage with our stakeholders to manage the social, environmental and ethical impact of our activities in the different markets in which we operate.

It is a fundamental principle that our business does not engage in bribery, corruption, any form of unethical inducement or payment or the evasion of tax payments to relevant bodies. All employees are required to avoid any activities that might lead to, or suggest, a conflict of interest with the business of the Company. In particular, employees who have direct control or influence over purchases of materials, supplies or external services must not accept or participate in anything which could be construed as an inducement to prefer one supplier over another. Employees must declare and keep a record of hospitality or gifts accepted or offered, which will be subject to managerial review. We do not make direct or indirect contributions to political parties. Any employee who suspects that necessary tax payments are being evaded within Amtico or throughout its supply chain should report this as outlined below.

### Key policy elements

- Any hospitality valued at more than £100 or individual gift valued at more than £50 must be approved by your line manager.
- Employees and employees' families should refuse to accept gifts or hospitality which could influence or appear to influence decisions they make on behalf of the Company.
- The acceptance and/or offer of small gifts such as flowers, and/or casual hospitality such as business lunches, is acceptable within reasonable bounds, as long as it is a normal and appropriate expression of business courtesy.
- Invitations to lunch or dinner from an external organisation should only be accepted where the primary reason for accepting an invitation is to discuss business matters either with representatives of the hosting organisation or with representatives of other organisations that may have business interests or activities in

common with the Company and where the venue and hospitality are not in themselves an inducement to accept the invitation or the purpose of the invitation.

- Gifts (defined as items given without the expectation of receiving anything in return) should not be accepted where they may appear to be disproportionately generous or could reasonably be construed as an inducement to affect a business decision.
- Hospitality that includes travel or overnight accommodation must not be accepted.
- Repeated invitations are deemed to be inappropriate, and any employee who has accepted hospitality of a social kind (e.g. sporting and cultural events) from an external organisation should not accept any further invitations of a similar type from the same organisation within the following twelve months.
- Employees must ensure that offering or accepting a gift or hospitality does not create or appear to create a conflict of interest for those involved.
- If there is any doubt about the propriety of accepting a gift or hospitality it should be refused or referred to your manager.
- The primary responsibility for deciding whether gifts or hospitality should be accepted lies with the employee. Employees should refer to this guidance.
- Amtico and its employees are responsible for preventing (where possible), identifying and reporting suspected tax evasion both internally and throughout its supply chain.

## **5. Directors**

In accordance with the provisions of the Companies Act 2006, Directors must not accept any benefit from a third party which he or she receives because they are a director of the Company except where the benefit cannot be reasonably regarded as likely to give rise to a conflict of interest.

## **6. Monitoring**

The Group Finance Director is the director with primary responsibility for implementing this policy and for monitoring compliance. The Director responsible for each business unit will establish appropriate responsibilities and procedures within their operations. If any instance of non-compliance with the stated Group policy is identified, we will take remedial steps immediately and report the matter to the appropriate body if required

## **7. Communications**

We will communicate this policy and relevant guidance to employees across the Group, through our established internal communication channels. We will also where appropriate communicate this policy to our suppliers, contractors and business partners and wider stakeholders.

## **8. Monitoring and review**

The Group Finance Director will review the implementation of this policy in respect of its suitability, adequacy and effectiveness and make improvements as appropriate, and ensure that any material non-compliance is reported to the Group Auditors, and that appropriate corrective action has been taken.

## 9. Internal controls and audit

Internal control systems will be subject to regular audits to provide assurance that they are effective in countering bribery and corruption.

## 10. Reporting

- Suspicions should be reported to the relevant senior manager or functional director
- If the issue concerns the relevant senior manager or functional director, suspicions should be reported to the Group Finance Director
- If an individual prefers to remain anonymous or believes that raising suspicions internally is not appropriate the concerns can be reported using Amtico's Whistleblowing Hotline service at [amtico.ethicspoint.com](http://amtico.ethicspoint.com) or calling 0800 086 9260. This is a transfer from Expolink as NAVEX has acquired Expolink in its entirety and we have not changed provider. Amtico's Whistleblowing Policy is available on its website
- Issues can also be reported via HMRC's "Report Tax Evasion" webpage

**Summary of Gifts & Hospitality Rules**

Type of Hospitality	Rules
Conventional hospitality such as lunches or dinners or small gifts (under £50).	Normally acceptable if in the interests of the Company
Other hospitality (particularly sporting and cultural events).	Acceptable if in the interests of the Company. These events can be of particular value where they support the establishment of relationships with strategic suppliers to the business or enhance the Company's knowledge or understanding of a particular area. For such events, the hospitality element should be incidental to the event and relevant business information is expected to be gained through attendance.
Travel and accommodation, holidays and the use of vehicles.	Not acceptable