

# BEYONDLY

G-5

## Anti-Bribery

### Policy Statement

Beyondly is committed to the practice of responsible corporate behaviour and to complying with all laws, regulations and other requirements which govern the conduct of our operations.

The Company is fully committed to instilling a strong anti-corruption culture and is fully committed to compliance with all anti-bribery and anti-corruption legislation including, but not limited to, the Bribery Act 2010 ("the Act") and ensures that no bribes or other corrupt payments, inducements or similar are made, offered, sought or obtained by us or anyone working on our behalf.

The five core values of Beyondly are Respect, Trust, Commitment, Passion and Innovation and it is our policy to conduct all of our business in line with these values. We take a zero-tolerance approach to bribery and corruption with all employees of Beyondly, and any 3<sup>rd</sup> party suppliers or partners we work in conjunction with.

### Bribery

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.

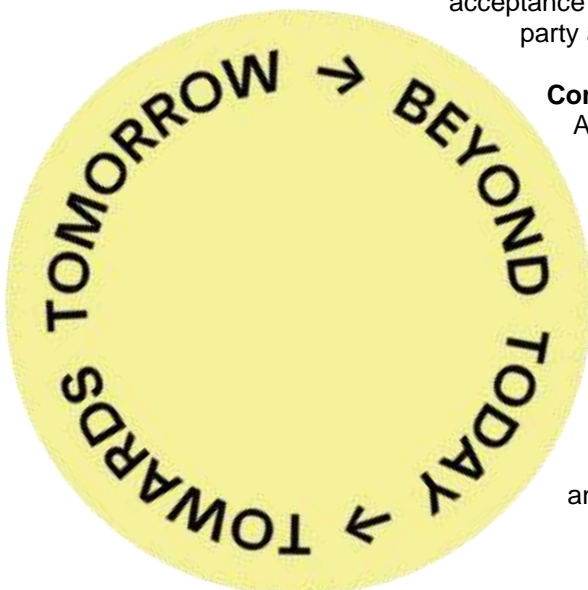
Bribery is also deemed to take place if any party requests or agrees to receive a financial or other advantage from another party where that advantage is intended to induce that party to perform a particular function improperly, where the acceptance of that advantage is in itself improper conduct, or where that party acts improperly in anticipation of such advantage.

### 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 employees of the Company, failure to comply with this Policy and/or with the Act may result in:

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



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For the Company, any breach of this Policy by any employee or business associate may result in:

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

**Responsibilities for Compliance and Scope of the Policy**

This Policy applies to all employees, agents, contractors, subcontractors, consultants, business partners and any other parties (including individuals, partnerships and bodies corporate) associated with the Company.

It is the responsibility of all of the above-mentioned parties to ensure that bribery is prevented, detected and reported and all such reports should be made in accordance with the Company's Whistleblowing Policy (G-6) or as otherwise stated in this Policy, as appropriate.

No party described above may;

- 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 from 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.

Parties described above must:

- be aware and alert at all times of all bribery risks as described in this Policy;
- exercise due diligence at all times when dealing with third parties on behalf of the Company; and
- report any and all concerns relating to bribery to the HR & Operations Director or, in the case of non-employees, their normal point of contact within the Company, or otherwise in accordance with the Company's Whistleblowing Policy (G-6).

**Gifts and Hospitality**

Gifts and hospitality remain a legitimate part of conducting business and should be provided only in compliance with the Company's Gifts and Hospitality Policy (G-7).

Gifts and hospitality can, when excessive, constitute a bribe and/or a conflict of interest. Care and due diligence should be exercised at all times when giving or receiving any form of gift or hospitality on behalf of the Company.

The following general principles apply:

- Gifts and hospitality may neither be given nor received as rewards, inducements or encouragement for preferential treatment or inappropriate



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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.
- Certain gifts which would otherwise be in breach of this Policy and/or the Hospitality and Gifts Policy 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 Managing Director's choosing.
- All gifts and hospitality, whether given or received, must be recorded in the Hospitality & Gifts Register.

### 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 authorised by the Managing Director.

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.

**Issue Number:** 2  
**Issue Date:** 11 April 2023  
**Issued by (Name):** Jessica Aldersley  
**Issued by (Signature):**



**Position:** Director

