

## **THE ASTIR GROUP ANTI-BRIBERY AND CORRUPTION POLICY**

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The Astir Group is committed to ensuring that its business is conducted according to ethical, professional and legal standards in a fair, honest and open manner. We will ensure this is reflected in every aspect of business that we undertake, so that we bring integrity to all our dealings.

Bribery and corruption expose the Astir Group, its employees and business partners to the risk of criminal prosecution in addition to harming the Group's reputation. Accordingly, the Astir Group operates a zero tolerance of all forms of bribery and corruption. It is vital that we ensure our employees and those who work on our behalf understand their responsibilities and operate to high ethical standards.

### **What is Bribery and Corruption?**

Bribery is the offer, promise, giving, demanding or acceptance of an advantage in monetary or other form, as an inducement or reward for the improper performance of a function or activity which is expected to be performed in good faith, or impartially or by someone in a position of trust. Bribery is a criminal act.

Corruption is the misuse of power for a gain. Bribery and corruption can take many forms

### **Our principles:**

We prohibit the offer, gift or acceptance of a bribe in any form, including kickbacks on any portion of a contract payment, facilitation payments or the use of other routes or channels to provide improper benefits to customers, agents, contractors, suppliers or employees of any such party or government officials. Whether extorted or not, facilitation payments are bribes and as such are also prohibited.

We also prohibit any employee or business partner from arranging or accepting a bribe, facilitation payments or kickbacks from customers, agents, contractors, suppliers or employees of any such party or from government officials, for their own benefit or that of their family, friends, associates or acquaintances.

We oppose all forms of bribery and corruption, large as well as small, whether initiated by corrupt officials or corrupt companies or individuals and whether it takes place in the public or private sector or in the UK or abroad.

This policy has been formally adopted by the Astir Group which is committed to preventing bribery and corruption. Our aim is to establish a culture within the Group and within our business partners in which bribery and corruption are never acceptable.

On behalf of the Board

Tim Simpkin 10 March 2022