

## ANTI BRIBERY AND CORRUPTION POLICY

### Purpose

The purpose of this policy is to establish controls to ensure compliance with all applicable anti-bribery regulations, and to ensure our business is conducted in a socially responsible manner. This policy applies to all the countries and territories that Three Dragons operates in.

### Policy statement

Bribery is the offering, promising, giving, accepting or soliciting of an advantage as an inducement for action which is illegal or a breach of trust. A bribe is an inducement or reward offered, promised or provided in order to gain any commercial, contractual, regulatory or personal advantage.

It is our policy to conduct all of our business in an honest and ethical manner. We take a zero-tolerance approach to bribery and corruption. We are committed to acting professionally, fairly and with integrity in all our business dealings and relationships wherever we operate, implementing, and enforcing effective systems to counter bribery.

We will uphold all laws relevant to countering bribery and corruption in all the jurisdictions in which we operate. However, we remain bound by the laws of the UK, including the Bribery Act 2010, in respect of our conduct both at home and abroad.

Bribery and corruption are punishable for individuals by up to ten years' imprisonment and a fine. If we are found to have taken part in corruption, we could face an unlimited fine, be excluded from tendering for public contracts and face damage to our reputation. We therefore take our legal responsibilities very seriously.

### Scope

**Who is covered by the policy?** In this policy, third party means any individual or organisation you meet during the course of your work for us, and includes actual and potential clients, customers, suppliers, distributors, business contacts, agents, advisers, and government and public bodies, including their advisors, representatives and officials, politicians and political parties. All arrangements with third parties should be subject to clear contractual terms, including specific provisions requiring them to comply with minimum standards and procedures in relation to bribery and corruption. Appropriate wording to be included in contracts can be obtained from the company director.

This policy applies to all employees (whether permanent, fixed-term or temporary), associates, consultants, contractors, trainees, seconded staff, home workers, casual workers and agency staff, volunteers, interns, agents, sponsors, or any other person associated with us, or any of our subsidiaries or their employees, wherever located (collectively referred to as employees in this policy).

This policy covers:

- Bribes;
- Gifts and hospitality;
- Facilitation payments
- Political contributions;
- Charitable contributions

## **Bribes**

Team members must not engage in any form of bribery, either directly or through any third party (such as an agent or distributor).

## **Gifts and hospitality**

Team members must not accept gifts from clients, contractors or third parties which are made to them as part of their role within Three Dragons. Purchase of meals and drinks in the course of business meetings is permitted, but all such meetings should be reported to and authorised by a Three Dragons Director.

## **Facilitation payments and kickbacks**

Facilitation payments are a form of bribery made for the purpose of expediting or facilitating the performance of a public official for a routine governmental action, and not to obtain or retain business or any improper business advantage. Facilitation payments tend to be demanded by low level officials to obtain a level of service, which one would normally be entitled to. Our strict policy is that facilitation payments must not be paid. We recognise, however, that our employees may be faced with situations where there is a risk to the personal security of an employee or his/her family and where a facilitation payment is unavoidable, in which case the following steps must be taken:

- Keep any amount to the minimum;
- Create a record concerning the payment; and,
- Report to their project manager within Three Dragons.

## **Political contributions**

Three Dragons as an organisation does not make donations, whether in cash or kind, in support of any political parties or candidates, as this can be perceived as an attempt to gain an improper business advantage.

## **Charitable contributions**

Charitable support and donations are acceptable (and indeed are encouraged), whether of in-kind services, knowledge, time, or direct financial contributions. However, team members must be careful to ensure that charitable contributions are not used as a scheme to conceal bribery. We only make charitable donations that are legal and ethical under local laws and practices]. No donation on behalf of the organisation must be offered or made without the prior approval of a Three Dragons Director.

## **Record-keeping**

Team members must declare and keep a written record of all gifts accepted or offered, which will be subject to management review.

## **How to raise a concern**

Team members are encouraged to raise concerns about any issue or suspicion of malpractice at the earliest possible stage. If you are unsure whether a particular act constitutes bribery or corruption, or if you have any other queries or concerns, these should be raised with a Three Dragons Director.

## **What to do if a victim of bribery or corruption**

It is important that team members tell a Three Dragons Director as soon as possible if they are offered a bribe by a third party, are asked to make one, suspect that this may happen in the future, or believe that you are a victim of another form of unlawful activity.

### **Protection**

Team members who refuse to accept or offer a bribe, or those who raise concerns or report another's wrongdoing, are sometimes worried about possible repercussions. Three Dragons aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken.

### **Training and communication**

Training on this policy forms part of the induction process for all new associates. All existing team members will receive regular, relevant training on how to adhere to this policy.

Our zero-tolerance approach to bribery and corruption must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and as appropriate thereafter.

### **Who is responsible for the policy?**

Three Dragons directors have overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it. Team members at all levels are responsible for ensuring those reporting to them are made aware of and understand this policy and are given adequate and regular training on it.

All team members are responsible for the success of this policy and should ensure they use it to disclose any suspected danger or wrongdoing.

We will monitor the operation of the policy and review the progress we have made each year, to make sure the policy is achieving its aims.