



Anti-Bribery and Corruption Policy

Introduction

Black Sun Global prohibits bribery and corruption in all business dealings, in every country around the world, with both government and private sector parties. It is our policy to conduct all our business in an honest and ethical manner. We take a zero-tolerance approach to bribery and corruption and are committed to acting professionally, fairly and with integrity in all our business dealings and relationships.

We will not request, accept, offer, provide or authorise bribes of any kind, including facilitation payments (defined below). Nor do we contribute to any political campaign, party, candidate, or their affiliated organisations. Bribes can take the form of gifts, entertainment, rebates, donations or favours. This summary provides an overview of the rules that must be followed to avoid behaviour that may be seen as bribery.

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for gross misconduct. Any non-employee who breaches this policy may have their contract terminated with immediate effect.



What are anti-bribery and corruption laws?

Most countries have their own anti-bribery and corruption laws, and these can apply to individuals and businesses wherever they are in the world. The purpose of these laws is to ensure that business is conducted in an honest and fair way.

Why do you need to comply with these laws?

Everyone working for, or on behalf of, the Company must comply with anti-bribery and corruption laws which exist in all countries where we operate.

Essentially, employees must not offer or receive financial, or other advantages, for the purpose of influencing or rewarding someone for doing something which could be improper. These laws also require the Company management to ensure that adequate procedures such as policies, internal controls and training initiatives exist to prevent acts of bribery. Failure to follow these laws and establish such procedures could subject our companies and employees to criminal charges, fines, and/or reputational damage.

How to spot bribery or corruption

Bribery: A bribe typically involves offering or receiving financial, or other advantages, for the purpose of influencing or rewarding someone for doing something. Financial or other advantages could be a gift, prize, business opportunity, personal advantage, commission, loan, fee, hospitality, service, discount, the award of a contract or anything else of value. Bribery includes offering, promising, giving, accepting or seeking a bribe.

Corruption: Corruption is a form of dishonest or unethical behaviour by a person entrusted with a position of power or authority – often for personal gain. An example of corruption would be making ‘facilitation payments’, which could be small or unofficial payments made to influence a government official.

All forms of bribery and corruption are strictly prohibited. If you are unsure about whether a particular act constitutes bribery, raise it with your manager or Director.

Specifically, you must not:

- give or offer any payment, gift, hospitality or other benefit in the expectation that a business advantage will be received in return, or to reward any business received;
- accept any offer from a third party that you know or suspect is made with the expectation that we will provide a business advantage for them or anyone else;
- give or offer any facilitation payment.



How can you report concerns or suspicions of bribery or corruption?

If you have any concerns about potential bribery or corruption, first raise these with your line manager or the Talent team. You must not threaten or retaliate against another person who has refused to offer or accept a bribe or who has raised concerns about possible bribery or corruption.

Receiving gifts and entertainment

You must neither offer inducements to conduct business nor solicit them from personnel of other institutions. A gift or hospitality will not be appropriate if it is unduly lavish or extravagant or could be seen as an inducement or reward for any preferential treatment (for example, during contractual negotiations or a tender process).

However, it is recognised that gifts and entertainment are offered in the normal course of business and do not necessarily constitute inducements. You are allowed to receive and retain gifts from clients or employees of other organisations provided that the value of the gift is below £50 (in part or cumulative value) and that it is given to you as a gesture of gratitude or goodwill.

You must report any gift or benefit, or other favour given or offered to you to the Finance Team, as soon as possible, regardless of the value. The notification should include a full description of the gift which will allow for an accurate assessment of its value. Except for minor items such as branded stationary, a letter of thanks should be sent to the sender, with a copy of your letter to the Finance Team.

Cash and cash convertible gifts may not be accepted in any circumstances. All gifts must be sent to the Company and not to a private address.

Your line manager will rule on any gift with a value which is deemed to be excessive, and you may be required to return it to the sender, with your thanks and apologies for not accepting it. Your line manager may, at their reasonable discretion, require you to refuse the offer (regardless of value) if they consider it inappropriate to accept it.

Without the prior written consent of your line manager, you should not offer a gift, favour or benefit to a client or employee of another organisation. Entertaining clients or employees of other organisations must be kept to a reasonable amount, and you must get prior consent from your line manager before you do so. Line managers are required to record the type, frequency and cost of entertainment which they approve.

Before accepting any invitation from any supplier, client, customer or other business contacts to attend any corporate hospitality event, function or trip, you must obtain the prior approval of your line manager. Attendance at such events should be justifiable on business grounds. The Company may limit the number of expenses available for attendance at such events.

Entertainment may not be accepted where a representative of the host company is not present at the event. Permission will not be granted for entertainment which is deemed to be excessive in terms of value or time.

Line managers are to record the type, frequency, and cost of the entertainment accepted by themselves and their employees with sufficient details of venue and attendees (both Black Sun and client / supplier) included on expense claims.



Communication

Black Sun Global ensures that its bribery prevention policies and procedures are embedded and understood throughout the organisation through internal and external communication.

Raising a concern

If you suspect there is an instance of bribery or corrupt activities occurring in relation to Black Sun Global, you are encouraged to raise your concerns as soon as possible through your line manager or Talent team. If you're uncertain about whether a certain action or behaviour can be considered bribery or corruption, you should speak to your line manager.