1 Policy Statement

1.1 The aim of this policy is to outline Roxane UK's strict adherence to the *Bribery Act 2010* and its commitment to carry out business in a fair, honest and open manner.

1.2 This policy applies to all employees working at any capacity within the company.

1.3 Failing to adhere to this policy will be considered an act of misconduct and will be actioned accordingly in line with the *Disciplinary Policy*.

2 Bribery

2.1 Bribery is the inducement of a personal reward with the expectation of receiving an advantage or other benefit when conducting business.

2.2 Bribes can take the form of money, gifts, loans, hospitality, services or discounts.

2.2.1 The offer or promise of the items stated above also constitutes bribery even if no transaction has been agreed or taken place.

2.3 Hospitality and gifts can be accepted by the business for legitimate purposes, such as relationship building or marketing, so long as they are reasonably proportionate:

2.3.1 Items or services received as such must be declared, within a reasonable timeframe, to a member of the management team.

3 Reporting

3.1 All employees are actively encouraged to report any potential instances of bribery to their line manager:

3.1.1 If an employee does not feel comfortable doing so, for whatever reason, they may report it to another member of the management team.

3.1.2 Should an employee wish to submit an anonymous report, they may do so by using the Roxane UK anonymous submission QR code displayed prominently around our sites or through the whistleblowing hotline.

3.2 Upon receiving a report, line managers are obligated to escalate the issue to the Plant Manager of their site:

3.2.1 If the Plant Manager is unavailable, line managers are obligated to escalate the issue to the UK Director.

3.3 No employee shall face ill-will or be subjected to any form of discrimination by virtue of submitting a report, regardless of its merits or eventual outcome.