

ANTI-BRIBERY & CORRUPTION STONBURY GROUP POLICY

Doc No. Policy-01 | Version 4.0 | Date 01-07-22 | Owner Chief Executive Officer

stonbury

PURPOSE

It is Stonbury policy to conduct business in an honest way, without the use of corrupt practices or acts of bribery to obtain an unfair advantage.

SCOPE

This policy applies to all group companies of Stonbury (Holdings) Ltd (the "Group"). It applies to all work activities undertaken on behalf of the businesses.

MEASURES

The business is committed to ensuring compliance to the highest legal and ethical standards, which must be reflected in every aspect of the way the company operates. We strive to ensure that integrity is brought to all company dealings. Bribery and corruption harm all business in which these acts are committed and prevents economic growth and development.

The policy is not just a cultural commitment on the part of the company it is a moral issue and a legal requirement. Bribery is a criminal offence and corrupt acts expose the Company and its employees to the risk of prosecution, fines, and imprisonment, as well as endangering our reputation. Stonbury, therefore, is committed to the implementation of bribery prevention policies / procedures designed to mitigate identified risks as well as to prevent deliberate unethical conduct. We aim to:

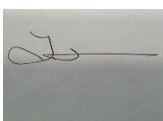
- Prevent bribery and corruption throughout the whole organisation through involvement of top-level management who will communicate the Anti-Bribery & Corruption Policy and associated procedures to all company employees and ensure that employees have signed a declaration that they have read and understood and will abide by the policy.
- Provide that all employees understand that breaches may be reported to the police and that bribery and corruption is a criminal offence that is punishable by up to 10 years imprisonment.
- Provide that the identified control measures within the Risk Assessments and Procedures are maintained and reviewed.
- Conduct due diligence of existing or prospective associated persons to Stonbury.
- Not provide the provision of gifts (other than Stonbury calendars provided at Christmas sanctioned by the board of directors), hospitality and promotional expenditure, political donations or demands for facilitation payments.
- Provide all direct and indirect employment including new recruits with a terms and conditions of employment including disciplinary action and remuneration.
- Provide the provision of financial and commercial controls through the company's accounting function, including external auditing and approval of expenditure at various levels.
- Provide transparency of relevant transactions and disclosure of information.
- Enforce the Anti-Bribery & Corruption Policy. Any breaches to the policy will result in disciplinary action against those found to be guilty.
- Maintain and communicate 'speak up' or 'whistle blowing' procedures to all company employees.

REVIEW AND COMMUNICATION

We will review and revise this policy at 12 monthly intervals. We will communicate this policy throughout all levels of the group and make it available to interested parties on request.

APPROVAL

Signed by the Chief Executive Officer



Trevor Hoyle
Date 1st July 2022