

# Anti-Bribery and Anti-Corruption Policy



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# Version History

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*The Legal Department is responsible for the content, communication and continuity of this policy. This policy should be reviewed on an annual basis to ensure compliance of international anti-corruption regulations and best practices.*

# Introduction

## Purpose

This policy reinforces Outpost24's commitment to legal compliance and ethical business conduct. We aim to eliminate bribery and corruption, ensuring all business operations uphold integrity and transparency.

## Scope

This policy applies to all employees, contractors, and partners of Outpost24 across all geographies.

## Helpful Definitions

**Bribe:** The offer, promise or payment of cash, gifts and other inducements or favours to a person in a position of authority or trust to influence that person's views or conduct or to obtain an improper advantage.

**Corruption:** The misuse of public or entrusted power for private profit or gain.

**Facilitation payments:** Payments intended to induce officials to perform, or to expedite, routine functions they are already otherwise obligated to perform.

**Kickbacks:** A payment or in-kind bribe given in return for facilitating a commercial transaction.

## Typical Areas of Bribery

The areas of business where corruption, including bribery, can most often occur include:

1. Gifts, Entertainment and Hospitality
2. Facilitation Payments
3. Procurement Process
4. Political, Community and Charitable Contributions

## Our Approach to Reducing and Controlling Risks of Bribery

**Regular Training and Awareness:** All Outpost24 employees undergo mandatory anti-bribery and anti-corruption training annually to ensure continuous education on the dangers of bribery and the importance of ethical business practices.

**Rigorous Monitoring and Auditing:** Implementing stringent auditing processes to detect and prevent corrupt practices.

**Transparent Reporting:** Encouraging a culture where concerns about bribery are openly reported without fear of retaliation.

## Rules about Gifts and Donations

### Gifts, Entertainment and Hospitality

Gifts, entertainment and hospitality are acceptable if they are reasonable, proportionate and made in good faith and in compliance with our company policies.

Criteria for assessing if a gift, entertainment and/or hospitality are for example:

1. Is the intent to build a relationship or is it something else?
2. Can the details stand for public scrutiny?
3. If we were the receiving party, how would we perceive it?

If you are in doubt in any way on how to interpret any of the above questions in a given situation, ask the Legal Department.

As a general rule, you may give a modest gift to external parties when appropriate, if you observe local law and it is accepted/approved by the Legal Department.

### Facilitation Payments

Facilitation payments are not allowed and if you are in doubt whether a payment could be regarded as such, ask the Legal Department.

### Procurement Process

You must follow Outpost24 processes and adhere to the system of internal controls. Supplier selection should never be based on receipt of a gift, hospitality or payment. We want to have suppliers that deliver the best services at the best price based on a fair competition.

### Political, Community and Charitable Contributions

You are not allowed to make political contributions from Company funds without authorization from the CEO.

Contributions made by Outpost24 to community projects or charities need to be made in good faith and in compliance with our policies and procedures.

# Books, Records and Internal Control Requirements

Expenses must never be hidden or purposefully misclassified and they should be able to pass an external audit. To ensure this, international anti-corruption laws generally require detailed and accurate accounting records for transactions, including cash and bank accounts. We must ensure we maintain accurate books, records and financial reporting, including a defined approval and controlling system to be applied on the financial records.

## Enforcement and Compliance

### Investigations

Any alleged breach of this policy will be thoroughly investigated.

### Disciplinary Actions

Violations will result in disciplinary action, up to and including termination.

### Legal Ramifications

Employees involved in bribery may also face personal legal consequences, including fines and imprisonment.

## Reporting and Whistleblowing

Outpost24 encourages employees to promptly report any suspected bribery or corrupt practices within the organization.

**Reporting Procedure:** If you have concerns about any suspected anti-bribery or anti-corruption violations, report them immediately to the Legal Department.

**Anonymous Reporting:** For those who prefer to report anonymously, Outpost24 maintains a whistleblowing channel to ensure that all employees have a safe and confidential way to voice serious concerns about bribery and corruption within the organization. The following resources are available:

Web & Telephone Numbers: <https://www.safecall.co.uk/file-a-report/>