



Anti-Bribery and Corruption Policy

Record UK Ltd

PREAMBLE

This version of the policy was approved by the Managing Director of record UK on the 22th June 2021. It supplements the group policy from record ag dated 3 July 2012, which applies all direct and indirect subsidiaries.

Introduction

Record UK strives to conduct business in compliance with applicable laws and regulations. This is reflected in every aspect of our business affairs and includes compliance with anti-trust regulation applicable in the UK.

Every corrupt act exposes the company and its employees to the risk of prosecution, fines and imprisonment, and endangers the company's reputation. Record UK therefore intends to limit the exposure by:

- Setting out a clear Anti-Bribery and Corruption Policy
- Taking firm action against any individual(s) involved in bribery and corruption

The **managing Director** is responsible for the communication of this policy to all employees concerned to ensure the necessary commitment. Any breach of this policy will be regarded as a serious matter and is likely to result in disciplinary action.

Compliance with Anti-Bribery and Corruption Laws

It is the company's policy to comply with all applicable anti-bribery and corruption laws in all countries where it operates. It is also the company's policy to require agents, sub-contractors and business partners who work on the company's behalf to comply with these same laws and practices.

Definitions

Bribery – Bribery is the direct or indirect offer, authorisation, gift or promise to provide something of value to a person or company with the intent to obtain or retain business or gain an improper advantage. It includes facilitation payments.

Corruption – Corruption is the abuse of entrusted power for a private gain.

Facilitation payments – These are payments, usually cash payments to officials, made as an inducement to speed up or facilitate a routine action or process.

Policy statement

The company prohibits:

Bribery of or by any person or company in any jurisdiction, wherever they are situated and whether they are a public official or body or private person or company or by any individual employee, agent or other person or body acting on the company's behalf in order to

- (i) gain a commercial, contractual or regulatory advantage for the company in a way which is unethical or
- (ii) gain a personal advantage, financial or otherwise, for the individual or anyone connected with the individual or
- (iii) induce the improper performance of a function that is of public nature, connected with a business, performed by a body or performed by a person in the course of their employment.

Contributions to **political parties** or entities associated with them are not allowed. Contributions to **charities** are permitted only after written approval by the Managing Director *and* the Group CEO has been informed.

Further Clarification

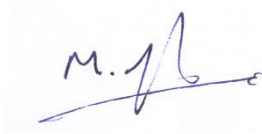
The company acknowledges that market practice varies across different countries. What is normal and acceptable in one place may not be in another.

This policy is not meant to prohibit the following practices which are customary in the UK, so long as they are proportionate and are properly recorded:

- normal and appropriate hospitality
- the giving of promotional corporate gifts at trade fairs, seminars and other meetings
- the giving of small value, token gifts in appreciation of business on special occasions, such as Christmas

Reporting incidents of Bribery and Corruption

The detection and reporting of bribery or corruption is the responsibility of all individuals within or associated with the company. Any incidents of bribery should be immediately reported to a line manager or a member of the key Leadership Team. Alternatively, reports can be sent confidentially directly to HR or to Agta Group Finance at compliance@agta-record.com.

A handwritten signature in blue ink, appearing to read 'M. Ayton', with a long horizontal stroke extending to the right.

Mark Ayton
Managing Director
Record UK

Dated: 23.06.23