

## Anti-Bribery & Corruption Policy

### Introduction

Prolux are committed to doing business in a way to maintain the trust and respect of our customers and the wider community. We never use, support or promote corrupt practices and respect anti-bribery and anti-corruption legislation.

### Application

This Anti-Bribery and Corruption Policy applies to all employees of Prolux and third party service providers acting for or on behalf of Prolux, regardless of where they are doing business in the world. For the purposes of this Anti-Bribery and Corruption Policy, an “employee” means employees (whether fixed term, permanent or temporary), directors, officers and other individuals working for Prolux, such as contractors and agency workers

### Prohibition on Bribery and Corruption

- Bribery is offering, promising, giving or accepting any financial or other advantage (for example, money, gifts, loans, fees, hospitality, services, discounts, or award of a contract) to induce the or any other person to act improperly in the performance of their functions, or to reward them for acting improperly, or where the recipient would act improperly by accepting the advantage.
- Corruption is the abuse of entrusted power or position for private gain.

Bribery and corruption offences present a serious risk for our business. Breaches of bribery and corruption laws can lead to imprisonment for individuals and unlimited fines, exclusion from tendering for public contracts and damage to reputation for companies.

No person who is subject to this Anti-Bribery and Corruption Policy will authorise or be a party to any financial payment or benefits in kind, with the intention of inducing or rewarding any person to perform improperly a function or activity that they are otherwise expected to undertake in good faith, impartially or from a position of trust.

A handwritten signature in black ink, appearing to be 'Alex Lamblin', written in a cursive style.

Director  
Alex Lamblin

**Effective Date:** 22<sup>nd</sup> January 2024  
**Policy Owner:** Managing Director  
**Approval:** SAI Global