

Bribery and Corruption Policy

Introduction

CMB is fundamentally opposed to any acts of bribery and to the making of facilitation payments as defined by the Bribery Act 2010.

Scope

This policy applies to all employees of the company, as well as, agency/temporary workers, consultants, contractors, agents and subsidiaries acting for, or on behalf of the company (Associated Person) within the UK and Overseas.

Any breach of this policy is likely to constitute a serious disciplinary, contractual and criminal matter or the individual concerned. It may also cause serious damage to the reputation and standing of the company.

The Policy

Employees and any associated person of the company are not permitted to either offer or receive any type of bribe and/or facilitation payment.

All employees are encouraged to report any suspicion of corruption or bribery within the company in accordance with the Whistleblowing Policy.

Should any employee or associated person be in doubt when receiving or issuing gifts/hospitality, refer to a senior manager for further advice.

Examples of a bribe might be cash, a gift or other inducement to, or from, any person or company whether public or government official of a state controlled industry, political party or a private person or company, regardless of whether the employee or associated person is situated in the UK or overseas.

The prohibition also applies to indirect contributions, payments or gifts made in any manner as an inducement or reward for improper performance, e.g. through consultants, contractors/sub-contractors, agents/sub-agents, sponsors/sub-sponsors, joint venture partners, advisors, customers, suppliers or other third parties.

All facilitation payments are banned and should not be made by any employee or associated person. A facilitation payment is a payment made to a government official to carry out or speed up a routine procedure. This includes overseas.

When asked for a potential facilitation payment, senior management should be consulted to consider whether it is a legitimate fee, for example part of a genuine fast-track process, or permitted locally, in which case the company may authorise such a payment. This must be investigated fully before it is authorised by the company and any employee or associated person must have written confirmation that they have been granted permission to make such a payment.

Any requests for facilitation should be recorded and reported using the procedure below 'Record Keeping'.

Working Overseas

Employees and associated persons conducting business on behalf of the company outside the UK must be aware of the greater risks of being exposed to bribery or unethical business conduct.

Employees and associated persons are required to co-operate with the company's reporting procedure. As detailed below 'Record Keeping'.

Employees and associated persons must declare the following immediately:

- Close family, person or business ties than any employee or associated person has with a government or corporate official
- A history of corruption in the country in which business is being undertaken
- Any requests for payments of cash
- Any requests for unusual payment arrangements, e.g. via a third party
- Any request for reimbursements of unsubstantiated or unusual expenses
- A lack of standard invoices and proper financial practices

Record Keeping

Employees and associated persons are required to take particular care to ensure that all company records are accurately maintained in relation to any contracts or business activities, including financial invoices and all payment transactions with clients, suppliers and public officials.

Due diligence should be undertaken by employees and associated persons prior to entering into any contract, arrangement or relationship with a potential supplier of services, agent, consultant or representative.

Employees and associated persons are required to keep accurate, detailed and up-to-date records of all corporate hospitality, entertainment or gifts accepted or offered.

Risk Management

The company will establish high risk areas and projects and they may be subject to greater scrutiny. Employees and associated persons will be informed of any increase in the reporting and recording procedures.

Reporting of Suspected Bribery

A form will be made available to staff to allow employees and associated persons to record any incidents of suspected briber. Any reports will be thoroughly and promptly investigated by senior management in the strictest of confidence.

All employee and associated persons are required to comply with the company's Whistleblowing Policy.

Action by the Company

CMB uses its reasonable endeavours to implement the guidance principles on bribery management that are published, from time to time, by the secretary of state in accordance with Section 9 of the Bribery Act 2010.

Anyone found guilty of bribery, will be responsible for bearing any related remedial costs such as losses, court fees or expenses.

Signed:

A handwritten signature in blue ink, appearing to be 'J. Green', written in a cursive style.

John Green
Operations Director

Date:

20th December 2023