

OVERVIEW

blu-3 Holdings and all subsidiary companies is committed to conducting business in an ethical and honest manner and will take all reasonable steps to ensure that corruption, bribery, and fraud is prevented in line with the Bribery Act 2010 or equivalent local act. We have a zero-tolerance for these activities. We are committed to acting professionally, fairly, and with integrity in all business dealings and relationships.

blu-3 considers that breaching competition law is unacceptable and adopts a zero-tolerance policy towards infringements of the UK Competition Act 1998 and Articles 81 and 82 of the EC Treaty or equivalent.

PURPOSE

This policy exists to set out the responsibilities of blu-3 and those who work for us in regard to observing and upholding our zero-tolerance position on fraud, bribery, corruption and anti-competitive. It also exists:

- to act as a source of information and guidance
- to help you to recognise and deal with fraud, bribery, corruption, and anti-competitive issues
- to help protect you, as well as understand your responsibilities

What is and what is not acceptable

We know that our people value relationships and work hard to build and maintain them. It is important to explain that normal and appropriate gestures of hospitality and goodwill (whether given to/or received from third parties) are acceptable, so long as the giving or receiving of gifts meets the following requirements:

- a. It is not made with the intention of influencing the party to whom it is being given, to obtain or reward the retention of a business or a business advantage, or as an explicit or implicit exchange for favours or benefits.
- b. It is not made with the suggestion that a return favour is expected.
- c. It is in compliance with local law.
- d. It is given in the name of the company, not in an individual's name.
- e. It does not include cash or a cash equivalent, e.g., a voucher or gift certificate.
- f. It is appropriate for the circumstances, e.g., giving small gifts around a holiday or as a small thank you to a company for helping with a project upon completion.
- g. It is of an appropriate type and value and given at an appropriate time, considering the reason for the gift.
- h. It is given or received openly, not secretly.
- i. It is not selectively given to a key, influential person, with the intention of directly influencing them.
- j. It is under £10. Anything above £10 must be approved by the general manager / operations directors or board and have a receipt provided. (As per the Holding-POL-PC-003 Gifts and Hospitality Policy)

It is not allowed to offer, or accepted from, a government official or representative, politician or political party or associated or family linked member, without the prior approval of the company's Financial Controller. When interacting with government officials, we follow the policy, laws, regulations. We do not make political contributions or sponsor political meetings, conferences or conventions. You do not undertake any paid services for any government / government official without approval from the board.

blu-3 are responsible for engaging with third parties on the management of bribery and corruption to ensure that they understand the risk, requirements set upon them by blu-3 and any other contributing factors (client requirements) that they must meet and accept when working for or on our behalf.

Charitable donations can only be approved by a board member, and this is required to meet all legislation, policy and local laws. This must be recorded, including the charity, contact, amount and date.

As good practice, gifts given and received should always be declared to the Corporate Support Team, who will then add to the Gift and Hospitality Register.

If you are not clear on any of these statements or are uncertain about the intention behind a gift being given / received, please do speak to a member of the People and Culture Team. All questions are valid questions: we would rather you ask and remain compliant and safe, than make a potentially costly mistake.

Employees should keep this policy in mind when dealing with competitors where there is any such risk, it must be reported, and blu-3 will monitor practices in areas of particular risk and will maintain processes to make sure no employee suffers adverse consequences as a result of reporting any suspicions.

We encourage the use of electronic communication with external parties so keep a record of conversations to eliminate misconstrued discussions. Always consult with the Head of Finance if in doubt. Minutes should be recorded and signed at all meetings which involve Government or political participation.

DEFINITIONS

"Bribery" / "Corruption": Bribery occurs when one person offers, pays, seeks or accepts a payment, gift, favour, or a financial or other advantage from another to influence a business outcome improperly, to induce or reward improper conduct or to gain any commercial, contractual, regulatory, or personal advantage. It can be direct or indirect through Third Parties.

"Conflict of Interest": Occurs when an individual or organisation is involved in multiple interests, one of which could possibly corrupt, or be perceived to corrupt, the motivation for an act in another.

"Anti-Competition": Occurs when businesses act together in ways that can prevent, restrict, or distort competition. For example, price fixing, bid rigging and other ways of agreeing not to compete and abuse of dominant markets.

"Employee": For the purposes of this policy this includes all individuals working at all levels and grades, including senior managers, officers, directors, employees (whether permanent, fixed-term or temporary), consultants, contractors, trainees, seconded staff, home-workers, casual workers and agency staff, volunteers, interns, agents, sponsors.

"Fraud": An act of deception that is intended to make a financial gain or to cause loss to another party.

"Third Party": Any individual or organisation you come into contact with during the course of your time with us. This includes actual and potential customers, suppliers, business contacts, intermediaries, government, and public bodies, including their advisors, representatives and officials, politicians and political parties.

PROCEDURE/PROCESSES

N/A

Danny Chaney



Chairman