

## ARINITE CORPORATE STATEMENT ON ANTI-BRIBERY AND CORRUPTION, INCLUDING ANTI-MONEY LAUNDERING

AMP007- June 2023

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Arinite is firmly committed to maintaining the highest standards of integrity, ethics, and compliance in all aspects of our operations.

We denounce bribery, corruption, and money laundering in any form and are dedicated to preventing and detecting these activities within our Organisation and the wider business community. Our commitment to anti-bribery and corruption, as well as anti-money laundering, is embedded in our core values.

### Receipt of Gifts

Working relationships may bring our staff into contact with outside organisations where it is normal business practice or social convention to offer hospitality, and sometimes gifts.

No employee and an Arinite Contractor or any member of their immediate family, are permitted to accept from a supplier, customer or other person doing business with Arinite, payments of money under any circumstances, nor special considerations, such as discounts or gifts of materials, equipment, services, facilities, or anything else of value unless:

- They are in each instance of a very minor nature usually associated with accepted business practice.
- They do not improperly interfere with our staff independence of judgement or action in the performance of their employment.

In every circumstance where a gift is offered, an Arinite Director will be informed.

### Bribery and other Corrupt Behaviour

The Company has a strict Anti-Bribery and Corruption Policy in line with the Bribery Act (2010).

A bribe is defined as: giving someone a financial or other advantage to encourage that person to perform their functions or activities improperly or to reward that person for having already done so.

A bribe, or attempt to bribe another person, intending either to obtain or retain business for the Organisation, or to obtain or retain an advantage in the conduct of the Organisation's business will be treated as gross misconduct.

Similarly accepting or allowing another person to accept a bribe will be considered gross misconduct. In these circumstances Arinite staff are subject to formal investigation under the Organisation's disciplinary procedures, and disciplinary action up to and including dismissal may be applied.

## ANTI-BRIBERY AND CORRUPTION

### Prohibition

We have a zero-tolerance policy towards all forms of bribery and corruption, including the offering, giving, receiving, or solicitation of bribes, whether directly or indirectly. This prohibition extends to all our interactions with clients, suppliers, contractors, regulatory authorities, and other stakeholders.

### Compliance with Laws

Arinite complies with all applicable anti-bribery and anti-corruption laws, regulations, and international conventions in every jurisdiction where we operate. We expect our employees, contractors, and business partners to adhere to these laws.

### Due Diligence

We conduct due diligence on our business partners, including suppliers, contractors, and consultants, to ensure their commitment to similar high standards of anti-bribery and corruption. We evaluate their reputation, integrity, and compliance practices before engaging in any business relationships.

### Gifts, Hospitality, and Entertainment

We have clear policies and guidelines regarding gifts, hospitality, and entertainment, ensuring they are given and received in a transparent, appropriate, and ethical manner, without influencing business decisions or compromising the integrity of our services.

### Reporting and Investigation

We have robust reporting mechanisms that enable our employees and stakeholders to report any suspicions or concerns about potential bribery or corruption. We treat all reports with the utmost seriousness and conduct prompt and thorough investigations, which to date have not been necessary. Confidentiality and protection against retaliation are guaranteed for those reporting in good faith.

### Training and Awareness

We provide training for our employees to raise awareness about the risks associated with bribery and corruption. We empower them to make ethical decisions and equip them with the knowledge and tools necessary to identify, prevent, and mitigate bribery and corruption risks.

## ANTI-MONEY LAUNDERING

### Prohibition

We prohibit the use of our Organisation for any activities related to money laundering, including the conversion or transfer of funds derived from illegal activities or terrorism financing.

## Compliance with Laws

We fully comply with all applicable anti-money laundering laws, regulations, and international standards. We maintain robust internal controls and procedures to prevent money laundering and were we called upon we would actively cooperate with regulatory authorities and law enforcement agencies.

## Client Due Diligence

We conduct due diligence on our clients to ensure we have a clear understanding of their identities, business activities, and the legitimacy of their funds. We implement ongoing monitoring and reporting mechanisms to identify and report any suspicious transactions as required by law.

## Staff Training

We provide comprehensive training to our employees and Contractors particularly those involved in financial transactions or client interactions, to recognise and effectively address potential money laundering activities.

## Reporting and Investigation

We have established mechanisms for reporting suspicious transactions, both internally and externally, in strict compliance with applicable regulations. We would promptly investigate any suspicions or allegations of money laundering, cooperating fully with relevant authorities as necessary.

## Policy Review

This Policy Statement and all relevant systems documentation will be reviewed by the Managing Director and managers at least annually and after any significant change to knowledge or the scale or nature of Arinite's operations.

Signed: ..... Date: 30<sup>th</sup> June 2023

## Next Review Due: June 2024

Reviewed by **Michele Jarvis** MSc DipNEBOSH FIIRSM CMIOSH MIIAI AIFSM