



Emergent Design Ltd ANTI-BRIBERY POLICY FOR BUSINESS PARTNERS

Who this policy covers

This policy applies to all people working on behalf of Emergent Design (the Company) in any capacity.

What is the purpose of the policy

One of the Company's core values is to uphold responsible and fair business practices. We are committed to promoting and maintaining the highest level of ethical standards in relation to all of our business activities. Our reputation for maintaining lawful business practices is of paramount importance and this Policy is designed to preserve these values. The Company therefore has a zero-tolerance policy towards bribery and corruption, we are committed to acting fairly and with integrity in all business dealings and relationships, and we never authorise a business partner to engage in bribery or corruption on our behalf.

We uphold all UK laws essential to countering bribery and corruption in the jurisdictions where we operate, including the Bribery Act 2010, in respect of our conduct both at home and abroad. A breach of the act can result in criminal charges, significant fines and a prison sentence of up to 10 years. The Bribery Act 2010 applies to all Company operations even if an offence is committed outside the UK and/or by a third party working on our behalf. When working on the Company behalf you must act in accordance with this Anti-Bribery Policy at all times.

What is bribery?

Bribery is offering, promising, giving or accepting an advantage intended to coerce someone into acting illegally, unethically or unjustly, or rewarding them for doing so. A bribe could be monetary, non-monetary, tangible or intangible and may take the form of, or be facilitated through:

- payments of money
- facilitation payments (small payments to public officials designed to ensure the prompt performance of duties)
- gifts or entertainment/hospitality
- discounts, loans and/or financing given on non-commercial terms
- rebates or kickbacks in relation to services provided
- overpayments to business partners
- use of assets at a discount or free of charge
- sponsorships, charitable contributions and community investments
- political contributions
- employment or internships
- information or assistance

with the expectation or hope of gaining a business advantage, to influence an outcome, or to reward a business advantage already given, for the Company.

How the policy works

It is unacceptable to offer, promise, give, request or accept a bribe to or from third parties including:

- actual and potential customers
- suppliers
- distributors
- business contacts
- agents
- advisers
- government and public bodies, including their advisors, representatives and officials, politicians and political parties



Gifts, hospitality and expenses

The Company allows for reasonable gifts and entertainment which are given:

- in good faith, occasional, reasonable and appropriate
- as a normal business courtesy
- openly rather than secretly
- In the Company rather than the individual's name

We do not allow for giving or accepting gifts and entertainment:

- with the intent or prospect of influencing decision-making or other conduct to obtain or retain business
- with the intent obtaining any improper or undue advantage
- which are reasonably capable of being regarded in any way as a bribe
- in the form of cash, which includes prepaid cards or gift cards which can be redeemed for cash

You may not therefore, without prior written consent of the Company, accept any gift, favour or hospitality of whatever kind from any customer, supplier or other person. Should the Company agree that it is permissible to accept such a gift, favour or hospitality, the full details must be forwarded to a Company Director, to be included in the Company Gifts and Hospitality register. Any such items are the property of the company and will be allocated at the discretion of a director only.

All expenses claims relating to hospitality, gifts or payments to third parties must be completely accurate and transparent, including full costs and reasons for the expenditure.

Any individual suspected to have breached the Company Anti-Bribery Policy will be subject to action which may result in the termination of our relationship.

Business partner responsibilities

- Individuals must ensure they read, understand and comply with this policy.
- Individuals are required to avoid any activity that might lead to or suggest a breach of this policy.
- Individuals must notify a Director as soon as possible if they believe or suspect that a conflict with this policy has occurred, or may occur in the future.

We are committed to ensuring that nobody suffers detrimental treatment as a result of refusing to take part in bribery, or because of reporting their suspicion of an actual or potential offence.

Breaches of this policy

Any business partner suspected to have breached the Company Anti-Bribery Policy will be subject to action which may result in the termination of our business relationship.