



Magontec Limited
Anti Bribery & Corruption Policy

Approved by BRC: 9th February 2021

ANTI BRIBERY AND CORRUPTION POLICY

Objective and Scope

Under this policy, Magontec seeks to conduct business in accordance with all applicable anti-bribery and corruption laws in all jurisdictions in which it operates.

It applies to Magontec Limited and all its subsidiaries including all directors, officers, employees and third parties engaged by Magontec to act on its behalf.

Definitions

Bribe – Any item of value or advantage intended to change a person’s behaviour so that they act illegally, unethically or contrary to duties owed to their employer. These include but are not limited to:

- Promising, offering or authorising anything of value, including giving aid, donations or voting
- Offering or receiving any inappropriate advantage;
- Facilitation payments, meaning any inappropriate payment to an official or political party to secure the performance of an action

Corruption – the abuse of power or position for personal or private gain.

Policy

Magontec directors, employees and any other third parties engaged to act on its behalf may not engage in any behaviour that can be deemed bribery or corruption in line with the “Definitions” section above, or any other behaviour which can be reasonably construed as such. This includes, but is not limited to accepting, receiving, soliciting, demanding or authorising any bribes or engaging in otherwise corrupt behaviour.

Reporting Channel

Instances of actual or suspected bribery or corruption should be reported in the first instance to either a direct supervisor, or to the Company Secretary. The Company Secretary will then raise the conduct with the appropriate parties including but not limited to the Board of Directors and the Finance, Audit & Compliance Committee. The Board or a Committee of the Board is to be informed of any material incidents reported under this Policy.

Consequences

The consequences of such breaches may involve disciplinary action including but not limited to termination of employment depending on the specific circumstances.

Changes

Changes to this policy are subject to the approval of the Board of Directors.

Discretion of the Board

For matters not specifically provided for in this Policy, the Board of Directors has discretion to address these provided such steps are reasonable and are not contrary to any applicable laws and regulations.