



*Efret Limited
Smartbase, Suite 111,
Target Road,
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Christchurch,
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England*

EFRET LTD BRIBERY ACT - COMPANY STATEMENT

Efret Ltd is committed to applying the highest standards of ethical conduct and integrity in its business activities in the UK and Continental Europe. Every employee and individual acting on **Efret Ltd.**'s behalf is responsible for maintaining the organisation's reputation and for conducting business honestly and professionally.

Efret Ltd considers that bribery and corruption has a detrimental impact on business by undermining good governance. We benefit from carrying out our functions in a transparent and ethical way and helping to ensure that there is honest, open and fair competition. Where there is a level playing field, **Efret Ltd** can lead by example and deliver excellent services to our customers and suppliers.

Transparent, fair conduct helps to foster deeper relationships of trust between **Efret Ltd** and our partners. It is vital for our reputation and future growth. **Efret Ltd** does not tolerate any form of bribery, whether direct or indirect, by, or of, its staff, agents or consultants or any persons or entities acting for it or on its behalf.

A bribe is a financial advantage or other reward that is offered to, given to, or received by an individual or company (whether directly or indirectly) to induce or influence that individual or company to perform public or corporate functions or duties improperly. Employees and others acting for or on behalf of the organisation are strictly prohibited from making, soliciting or receiving any bribes or unauthorised payments.

The Board and Senior Management are also committed to ensuring that our suppliers, agents, consultants and contractors throughout our supply chain have or adopt a similar approach. All our suppliers and contractors are required to endorse and adhere to our supplier code of conduct, which includes the above principles, in accordance with the Bribery Act 2010.

As part of its anti-bribery measures, the organisation is committed to transparent, proportionate, reasonable and bona fide hospitality and promotional expenditure. Such expenditure must be authorised in advance, in accordance with the procedures set out in the organisation's policies. A breach of the organisation's Standards of Business Conduct policy by an employee will be treated as grounds for disciplinary action, which may result in a finding of gross misconduct, and immediate dismissal. Employees and other individuals acting for the organisation should note that bribery is a

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criminal offence that may result in up to 10 years' imprisonment and/or an unlimited fine for the individual and an unlimited fine for the organisation.

Efret Ltd will not conduct business with service providers, agents or representatives that do not support the organisation's anti-bribery objectives. We reserve the right to terminate its contractual arrangements with any third parties acting for, or on behalf of, the organisation with immediate effect where there is evidence that they have committed acts of bribery.

The success of the organisation's anti-bribery measures depends on all employees, and those acting for the organisation, playing their part in helping to detect and eradicate bribery. Therefore, all employees and others acting for, or on behalf of, the organisation are encouraged to report any suspected bribery act. **Efret Ltd** will support any individuals who make such a report, provided that it is made in good faith.

Efret Ltd has a zero-tolerance approach to any breach of the Bribery Act 2010 and any issues raised will be treated with the utmost importance.

Policy Editor	Primary Contact	Initial Effective Date	Annual Review Date	Approval Date
A Jestin	C Duval	January 1 st , 2018	22 nd November, 2022	22 nd November, 2022
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