

# Anti-Bribery and Corruption Policy



CHRYSAOR

# Anti-Bribery and Corruption

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## Our Approach

The highest standards of integrity are fundamental to the way Chrysaor conducts business. As part of this commitment, Chrysaor will not tolerate any form of bribery or corruption in our business. Compliance with anti-bribery and anti-corruption laws, in particular the UK Bribery Act, and understanding those laws and the ethical standards required of all of us is essential.

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## Who does it apply to?

All individuals working for Chrysaor at all levels, including those acting for or on Chrysaor's behalf, are strictly prohibited from offering, paying, soliciting or accepting bribes or any form of kickback, including facilitation payments.

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## What happens if I don't comply?

Given the serious nature of a breach, an individual's failure to comply with this policy, whether intentionally or by an act of negligence, may lead to disciplinary action being taken that could ultimately result in termination of employment or engagement.

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## What is bribery?

A bribe is an inducement or reward offered, promised or provided in order to gain any commercial, contractual, regulatory or personal advantage.

Offering and agreeing to accept a bribe is still a bribe and it doesn't matter if the bribe is ultimately not paid. Some typical examples of bribery include:

- you offer a person tickets to a major sporting event, but only hand over the tickets if that person agrees to do business with you;
- cash payments by employees to third parties such as consortium members, introducers or consultants;
- loan guarantees or other extensions of credit providing a subcontract to a person connected to someone involved in awarding the main contract;
- political or charitable donations made to a third party linked to, or at the request of, someone with whom Chrysaor does business; or
- a contracted project manager makes a payment to someone in order to expedite the work of the project.

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## What are facilitation payments?

A facilitation payment is a type of bribe and should be seen as such. A common example is where a government official is given money or goods to perform (or speed up the performance of) an existing duty.

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## What is the policy on facilitation payments?

Chrysaor does not make, and will not accept, facilitation payments of any kind, or in any circumstances. Although these are not commonly paid in the UK, we uphold the prohibition of the making and receiving of such payments wherever we operate.

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## Does this policy apply to third parties?

We require that third parties, including contractors, who have a contractual or other business relationship with Chrysaor to adhere to this Policy.

In addition, Chrysaor requires that due diligence should be conducted on such third parties, using a risk-based approach having regard to, among other things, the work being undertaken, the location of that third party's business and any history of non-compliance or bribery with respect to that third party.

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## What is the policy with regards to donations?

We do not make contributions to political parties or politicians in any country. We only make charitable donations that are legal and ethical under local laws and practices. No donation should be made, under any circumstances, without the prior approval of the Chief Executive Officer.

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## What are my responsibilities?

Every Chrysaor employee is responsible for compliance with this policy. You must ensure that you read, understand and comply with this policy at all times.

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## Who monitors adherence to the policy?

Adherence to the policy will be subject to regular review by the General Counsel. Chrysaor will also provide appropriate training for relevant employees regarding this policy and general compliance with anti-bribery obligations.

The General Counsel has responsibility for the day-to-day implementation of this policy, monitoring its suitability, adequacy and effectiveness.

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## How do I report an issue?

All Chrysaor employees are required to assist in tackling fraud, corruption and other malpractice within the organisation. If you are aware of, or suspect that bribery may be taking place within Chrysaor, you should report your suspicions to an appropriate person. If you are in doubt that your concerns have been or will be dealt with properly, you should raise the matter directly with any Executive Director or the General Counsel.

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## What will be the consequences of reporting?

If you genuinely believe that there is some form of malpractice occurring and raise a concern in good faith and without malicious intent, Chrysaor will ensure that you do not suffer any disadvantage in the workplace as a result of speaking up, whatever the outcome of the investigation.