

## Anti- Bribery and Corruption

### Policy Statement

All employees and associated persons are required to:

- Comply with any anti-Bribery and anti-corruption legislation that applies in any jurisdiction in any part of the world in which they might be expected to conduct business
- Act Honestly, responsibly and with integrity
- Safeguard and uphold the smart platforms core values by operating in an ethical, professional and lawful manner at all times.

Bribery of any kind is strictly prohibited. Under no circumstances should any provision be made, money set aside from accounts created for the purpose of facilitating the payment or receipt of a bribe.

Smart Platforms recognizes that industry practices may vary from country to country or from culture to culture. What is considered unacceptable in one place may be normal or usual practice in another. Nevertheless, a strict adherence to the guidance set out in this policy is expected of all employees and associated persons at all times. If in doubt as to what might amount to bribery or what might constitute a breach of this policy, refer the matter to your line manager.


For the Smart Platforms rules and procedures in relation to the receipt of the business gifts from third parties and corporate hospitality offered to or received from third parties, please refer to the Smart Platform gifts from clients/suppliers' policy and its corporate hospitality policy. They form part of the Smart Platforms zero tolerance policy towards bribery and they should be read in conjunction with this policy statement.

The giving of business gifts to clients, customers, contractors and suppliers is not prohibited provided the following requirements are met;

- The gift is not made with the intention of influencing a third party to obtain or retain business or a business advantage, or to reward the provision or retention of business or a business advantage
- It complies with local laws
- It is given in the smart platform name, not in the giver's personal name
- It does not include cash or a cash equivalent (such as gift vouchers)
- It is of an appropriate and reasonable type and value and given at an appropriate time
- It is given openly, not secretly
- It is approved in advance by a director of Smart Platforms.

In summary, it is not acceptable to give, promise to give, or offer, payment, gift or hospitality with the expectation or hope that a business advantage will be received, or to reward a business advantage already given, or to accept a payment, gift or hospitality from a third party that know or suspect is offered or provided with the expectation that it will obtain a business advantage for them.

Any payment or gift to a public official or other person to secure or accelerate the prompt or proper performance of a routine government procedure or process, otherwise known as a "facilitation payment", is also strictly prohibited. Facilitation payments are not commonly paid in the UK but they are common in some other jurisdictions.

Signed:   
Andy Burt (Mar 4, 2022 15:56 GMT)

Dated: Mar 4, 2022

**Andy Burt Managing Director**