

## Flint Group Anti-Bribery and Corruption Policy Overview

Trustworthy is one of Flint Group's core values. We are fully committed to conducting business in an honest and ethical manner, adhering to all relevant anti-bribery and corruption laws across the regions where we operate. This policy overview reflects our commitment to upholding the highest standards of professional conduct and outlines our approach to preventing, detecting, and addressing bribery and corruption.

### **Key Principles / Commitments:**

**Zero Tolerance for Bribery:** Flint Group strictly prohibits any form of bribery or corruption. This applies to all employees, agents, and associated third parties (such as contractors and suppliers), regardless of their location or position.

**Compliance with Laws:** All employees, third-party intermediaries (e.g., agents, suppliers), and associated parties must comply with all applicable anti-corruption laws, including the US Foreign Corrupt Practices Act (FCPA), the UK Bribery Act, relevant EU directives, and the United Nations Convention against Corruption (UNCAC).

### **Prohibited Payments:**

Actions such as offering, soliciting, or accepting bribes, facilitation payments, or kickbacks are strictly forbidden. This includes cash, gifts, entertainment, or non-cash benefits provided to influence business decisions.

**Permitted Payments:** Legitimate business expenses, such as promotional hospitality or charitable contributions, are allowed only when they comply with our Code of Conduct, our policies and relevant laws. These payments must be reasonable, documented, and should not influence business decisions.

**Recordkeeping:** Accurate recordkeeping is essential. All transactions must be transparently recorded and reflect the true nature of the transaction. Any attempt to falsify records is strictly prohibited.

**Reporting Concerns:** We encourage all employees and associated parties to report any concerns related to bribery or corruption through our dedicated [Integrity Assurance Hotline](#). Reports are treated confidentially, and we do not tolerate retaliation against those who report in good faith.

**Consequences of Non-Compliance:** Violations of this policy may result in disciplinary action, up to and including termination of employment, as well as potential legal consequences.

### **Commitment to Ethical Business Practices**

We expect all employees and partners to engage in business activities that reflect our commitment to integrity and ethical behaviour. Through regular training, monitoring, and audits, we aim to ensure compliance with this policy and to maintain a culture of transparency and accountability.