

Joloda Hydraroll Group Anti-Bribery & Corruption Policy

1. Introduction

Bribery and corruption are serious criminal offences. They undermine fair competition, damage trust, and expose both individuals and organisations to severe penalties.

For the purposes of this policy:

- **Bribery** is the offering, giving, requesting, or accepting of any financial or other advantage as an inducement or reward for acting improperly, dishonestly, or in breach of trust.
- **Corruption** is the abuse of entrusted power or position for private gain, whether financial or otherwise.

The Joloda Hydraroll Group ("the Group"), including all subsidiaries and joint ventures, has a zero-tolerance approach to bribery and corruption. We are committed to conducting business ethically, transparently, and in full compliance with all applicable anti-bribery and corruption laws (including the UK Bribery Act 2010, the EU Anti-Corruption Directive, the US Foreign Corrupt Practices Act (FCPA), and relevant local legislation in the countries where we operate).

Integrity is central to our reputation and long-term success. No employee, director, contractor, or third party acting on our behalf may engage in any form of bribery or corrupt practice.

2. Offences

It is a criminal offence for any individual or organisation to:

- Offer, promise, or give a bribe.
- Request, agree to receive, or accept a bribe.
- Bribe a foreign public official.
- As a commercial organisation, fail to prevent bribery by those acting on its behalf.

Penalties include up to 10 years' imprisonment, unlimited fines, and serious reputational damage to the Group.

3. Purpose

The purpose of this policy is to:

- Confirm the Group's commitment to fair, legal, and ethical business conduct.
- Provide clear rules for employees, managers, and third parties acting for or with us.
- Protect the Group, its employees, and its stakeholders from the risks of bribery and corruption.
- Ensure compliance with applicable international and local anti-bribery legislation.

4. Scope

This policy applies to:

- All employees and directors of the Joloda Hydraroll Group, regardless of role, grade, or location.
- Third parties acting on our behalf, including contractors, consultants, agents, distributors, intermediaries, suppliers, and joint venture partners.

We also expect suppliers, customers, and other business partners to uphold the same high standards of integrity.

5. Policy Requirements

5.1 Bribery & Corruption Prohibited

- No employee or third party may offer, give, request, or accept any bribe or corrupt advantage in any form (cash, gifts, loans, hospitality, services, or favours), with the exception of reasonable and transparent gifts or hospitality as detailed in 5.2.
- A bribe is any advantage intended to improperly influence a business decision or gain an unfair advantage.
- Facilitation payments (small, unofficial payments to speed up routine government actions) are prohibited, regardless of local practice.

- Payments to or on behalf of foreign public officials must never be made with the intention of influencing them improperly.

5.2 Gifts & Hospitality

We recognise that reasonable, proportionate, and transparent gifts and hospitality may be appropriate to build legitimate business relationships. However:

- No gift or hospitality may be given or accepted without prior approval from a director.
- All gifts and hospitality must be recorded in a Gifts & Hospitality Register.
- Cash or cash equivalents (such as vouchers or gift cards) are strictly prohibited.

5.3 Sponsorships, Charitable Donations & Political Contributions

- All donations, sponsorships, or contributions must be transparent, approved by a director, and properly recorded.
- Political donations are strictly prohibited.

5.4 Conflicts of Interest

Employees must avoid situations where personal interests could conflict with the Group's interests. Any potential conflict must be declared immediately to a director.

5.5 Due Diligence

The Group will conduct risk-based due diligence on suppliers, agents, contractors, distributors, and joint venture partners before and during engagement to ensure compliance with anti-bribery standards.

5.6 Reporting & Whistleblowing

- Any suspicion of bribery or corruption must be reported immediately to a director.
- Employees are protected by the Group's Whistleblowing Policy and will not face retaliation for raising concerns in good faith.

6. Responsibilities

- Employees & Third Parties: Must comply with this policy, complete training as required, and report concerns promptly.
- Managers: Must lead by example, ensure compliance in their teams, and escalate issues where necessary.
- The Group Board & Senior Leadership: Hold ultimate responsibility for ensuring compliance with this policy and relevant laws.

7. Breaches & Disciplinary Action

Any breach of this policy will be treated as a serious disciplinary offence and may result in:

- Dismissal for employees.
- Termination of contracts with third parties.
- Criminal prosecution and civil penalties where applicable.

8. Monitoring & Review

- The Group will maintain procedures to monitor compliance with this policy.
- Internal audits, risk assessments, and annual reviews will ensure its continued effectiveness.
- The policy may be amended at any time to reflect legal or regulatory changes.

9. Training & Awareness

- All employees will receive mandatory anti-bribery and corruption training appropriate to their role.
- Refresher training and awareness communications will be provided periodically.