

Augean plc anti-bribery policy

Augean plc is committed to carry out its business in a fair, open and honest manner, never resorting to bribery as a means to gain any business advantage or return. The board of directors believe that the rejection of bribery is consistent with good business, in the same way that we are fully committed to high standards of health & safety and compliance.

By rejecting bribery the company will maintain its strong reputation for providing a high quality of service to our customers, retain the confidence of our suppliers and reassure our shareholders, partners and other stakeholders.

In no circumstances will the use of bribery on behalf of the company be tolerated. Any employee found to have committed a bribery or corruption offence will be subject to disciplinary action and may face dismissal, in line with company policy. Any employee who is found to have colluded in or concealed any bribery offence may also face disciplinary action.

The following actions by employees are considered to constitute Gross Misconduct:

- i) Receiving and/or giving of bribes to effect the placing of business with a customer, supplier of goods or services, or other third party.
- ii) Encouraging or directing any partner or agent of the company to bribe a third party with the intention of effecting the placing of business on behalf of the company.

In the event that Gross Misconduct is proven against any employee, following the established company disciplinary procedures, this will lead to dismissal.

In addition the company has introduced the following policies for hospitality and gifts:

- i) **Hospitality policy**
The company does not prohibit the giving and receiving of hospitality by employees to/from customers, suppliers, or agents. However if hospitality is given or received this must never be a means to gain any business advantage or return and must never be considered excessive or disproportionate.
- ii) **Gifts policy**
The company does not prohibit the giving and receiving of gifts by employees to/from customers, suppliers, or agents. However if gifts are given or received this must never be a means to gain any business advantage or return and must never be considered excessive or disproportionate.

The company is committed to the highest standards of openness and accountability. To ensure that employees can voice concerns if they believe they have discovered malpractice a whistleblowing policy has been introduced. Employees are encouraged to report bribery activity whenever they discover it in the knowledge that protections are in place should they need them.

The company's success in maintaining its approach to preventing bribery will be monitored on a regular basis, including an annual update to the board on the risks faced by the company.