

# Anti bribery, corruption and corporate criminal offences

## Policy Statement

It is Everything Managed Group's policy to conduct all of our business in an honest and ethical manner. We are committed to acting professionally, fairly and with integrity in all of our business dealings and relationships, implementing and enforcing effective systems to counter bribery, corruption and tax evasion.

We will uphold all laws relevant to countering bribery and corruption in the UK including the Bribery Act 2010 and Corporate Criminal Offences Act 2017. We will prohibit bribery, corruption and any form of tax evasion via:

- A top-level commitment to anti-corruption compliance
- A clear ethical approach to all work, which includes this policy, guidance on the provision/receipt of gifts and entertainment and also the Business Code of Conduct
- A training plan approach to cover all employees in relevant posts
- Monitoring and reviewing of the policies and procedures in place
- Escalation and whistle-blowing routes to encourage employees to report any suspicion of bribery, corruption or tax evasion
- A commitment that firm action will be taken against any individual(s) or company involved in bribery, corruption or tax evasion

## Scope

All people employed within a Group business in any capacity and at any level of seniority.

All associated persons who work with Everything Managed Group including subcontractors, suppliers and clients. We expect those persons to abide by the provisions of this policy or alternatively have in place equivalent policies.

## Group Business Obligations

Each Group business will:

- Operate in line with the Group Policy and Procedures
- Provide suitable and sufficient resources to enable the policy to be implemented
- Provide our people with adequate training, information and instruction to ensure they act within the policy parameters
- Be able to demonstrate compliance with this policy
- Notify relevant individuals of any issues or complaints which may have an impact on the reputation or standing of the individual Group Company or Everything Managed Group as a whole

## Indicative Policies/Procedures/Codes of Conduct

EMG-POL-ETH-001 Anti-Bribery, Anti-Corruption and Corporate Criminal Offences Policy

EMG-POL-ETH-002 Ethical Business Code of Conduct



Damon Smith – Chief Executive Officer, January 2023 (reviewed annually).