

## Anti-Bribery and Corruption Policy

The Bribery Act 2010 (“the Act”) came into force on the 1 July 2011. It prohibits the offering or receiving of any incentive (financial or otherwise) that has the intention of inducing a person to perform a function or activity improperly.

Bribery is the offering, promising, giving, solicitation or the receipt or agreement to receive any financial or other advantage, or any other inducement from any person or company, (wherever they are situated and whether they are a public official or body, or a private person or company) by an individual employee, agent or other person or body acting on another’s behalf.

Corruption is the abuse of entrusted power for a private gain.

Encompass Group prohibits bribery of or by any person or company, in any jurisdiction, wherever they are situated and whether they are a public official or body or private person or company or by any individual employee, agent or other person or body acting on Encompass Groups behalf in order to:

I. gain any commercial, contractual or regulatory advantage for Encompass Group in a way which is unethical or;

II. gain any personal advantage, pecuniary or otherwise, for the individual or anyone connected with the individual or;

III. induce the improper performance of any function that is of a public nature, connected with a business, performed by a body or performed by a person in the course of their employment.

When acting for Encompass Group, political contributions are not allowed and charitable contributions are allowed only within agreed corporate schemes and guidelines.

Facilitation payments are any payment made (except where comprised in a lawful and published tariff of general application) as an inducement to secure or expedite the performance of a routine or necessary action to which the payer of the facilitation payment has a legal entitlement. These are not permitted or condoned by Encompass Group.

This policy is not meant to prohibit the following practices providing they are customary in a particular market, are proportionate and are properly recorded:

- normal and appropriate hospitality;
- the giving of a ceremonial gift on a festival or at another special time;
- the use of any recognised fast-track process which is available to all on payment of a fee.

The prevention, detection and reporting of bribery or corruption is the responsibility of all persons within or associated with Encompass Group.