



Business Policy: External Anti-Bribery and Corruption Statement

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Semperian is committed to conducting business in an ethical manner without the use of corrupt practices or acts of bribery to obtain an unfair advantage. Fraud, bribery and other corrupt business practices are damaging to an organisation's finances and reputation. It is recognised that bribery and corruption cause harm to the societies in which the acts are committed.

Semperian's approach to bribery and corruption is:

Not to:

- participate in any form of corrupt behaviour including the offering, giving, solicitation, acceptance or receipt of any bribe;
- engage public officials to provide services improperly or without proper approval;
- conceal or fail to record accurately and completely the true nature of our activities, or falsify or tamper with the company's books or records;
- improperly pay more than fair market value for goods and services;
- make facilitation payments;
- give or receive gifts or hospitality as an improper inducement, or creating a conflict of interest;
- give charitable contributions (including sponsorships and other advantages) for improper purposes; or
- engage third parties to make improper payments or participate in any kind of corrupt activity on its behalf;

Always to:

- seek to avoid the appearance of wrongdoing, recognising that an allegation of bribery or corruption can seriously damage the company's reputation;
- carry out appropriate anti-bribery due diligence when engaging or entering into contracts with third parties;
- ensure contract and procurement documents include appropriate anti-bribery measures;
- ensure company staff and/or those persons operating on behalf of the company receive training regarding its bribery and corruption policy and procedures and understand the implications of non-compliance;
- ensure that the company has in place appropriate procedures for company representatives to report instances or allegations of bribery or corruption;
- assess compliance through financial and governance procedures; and
- maintain a gifts and hospitality register to record all instances of gifts or hospitality given or received which meet the relevant thresholds in place from time to time, seeking approval in advance if appropriate.

Date:

Semperian will review this statement on an annual basis to ensure its continued suitability.