

AM-POL-009

Anti Bribery and Corruption Policy

This document sets out the rules of Amaro in relation to anti-bribery and corruption matters throughout all areas of its operations.

The UK anti bribery and corruption legislation applies to all activities of a UK-based business no matter where they are carried out in the world. This policy therefore applies to ALL activities worldwide, whatever the local law, practice or custom may be.

Amaro values its reputation for ethical behaviour and for financial probity and reliability. It recognises that any involvement in bribery and/or corruption will also reflect adversely on its image and reputation. Its aim therefore is to limit its exposure to bribery and corruption by:

- Setting out a clear Anti-Bribery and Corruption Policy
- Training all staff so that they can recognise and avoid the use of bribery and/or corruption
- Encouraging its staff to be vigilant and to report any suspicion of bribery and/or corruption; by providing them with suitable channels of communication and ensuring sensitive information is treated appropriately
- Rigorously investigating instances of alleged bribery and/or corruption and assisting the police and other authorities in any prosecution that may result
- Taking firm and vigorous action against any individual(s) involved in bribery and/or corruption

Bribery is the offer or receipt of any gift, loan, payment, reward or other advantage to or from any person as an encouragement to do something which is dishonest, illegal or a breach of trust, in the conduct of the Company's business.

Corruption is the misuse of entrusted power for private gain.

Amaro prohibits: Bribery of or by any person or company, in any jurisdiction, wherever they are situated and whether they are a public official, body or private person, company or by any individual employee, agent or other person or body acting on Amaro's behalf, in order to:

- Gain any commercial, contractual or regulatory advantage for the Group in a way which is unethical.
- Gain any personal advantage, pecuniary or otherwise, for the individual or anyone connected with the individual.
- Induce the improper performance of any function that is connected with a business, performed by a body or performed by a person in the course of their employment.

When acting on behalf of Amaro, political contributions are not allowed, and charitable contributions are allowed only within agreed formal Amaro company schemes and guidelines.

Amaro recognises that market practice varies across the territories in which it does business and what is normal and acceptable in one place may not be in another. 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

Reports can be made confidentially in writing to the Managing Director. If you are at any time uncertain as to whether your actions will comply with this policy, you must seek guidance from the Managing Director.

Compliance with the Company's policy in relation to bribery and/or corruption is regarded as part of the contract of employment. If you fail for any reason to follow the rules set out in this document this may result in disciplinary action being taken against you which could result in your dismissal.

To place this in context, you should be aware that if you engage in activities which are contrary to UK anti-bribery and corruption legislation, you could face up to 10 years in prison and/or an unlimited fine, and the Company could also be liable to an unlimited fine and Government sanction.

Review

This policy will be reviewed annually or when statutory or operational requirements necessitate a formal review.

End of Policy



Mr Michael Ewart
Managing Director

09.01.2024