

# **MTEC ANTI-CORRUPTION, BRIBERY AND MODERN SLAVERY POLICY**

<b>Policy Area</b>	<b>HR</b>
<b>Standard:</b>	Mtec Anti-Corruption, Bribery and Modern Slavery Policy
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<b>Document owner:</b>	Lia Nelissen

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## 1. About this policy

- 1.1. It is our policy to conduct all of our business in an honest and ethical manner. We take a zero-tolerance approach to bribery, corruption and modern slavery and are committed to acting professionally, fairly, ethically and with integrity in all our business dealings and relationships.
- 1.2. This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners.
- 1.3. Any employee who breaches this policy will face disciplinary action, which could result in dismissal for gross misconduct. Any non-employee who breaches this policy may have their contract terminated with immediate effect.
- 1.4. This policy does not form part of any employee's contract of employment and we may amend it at any time. It will be reviewed regularly.

## 2. What is bribery?

- 2.1. A bribe is a financial or other inducement or reward for action which is illegal, unethical, a breach of trust or improper in any way. Bribes can take the form of money, gifts, loans, fees, hospitality, services, discounts, the award of a contract or any other advantage or benefit.
- 2.2. Bribery includes offering, promising, giving, accepting or seeking a bribe.
- 2.3. All forms of bribery are strictly prohibited. If you are unsure about whether a particular act constitutes bribery, raise it with your line manager or HR team.
- 2.4. Specifically, you must not:
  - 2.4.1. give or offer any payment, gift, hospitality or other benefit in the expectation that a business advantage will be received in return, or to reward any business received;
  - 2.4.2. accept any offer from a third party that you know or suspect is made with the expectation that we will provide a business advantage for them or anyone else;
  - 2.4.3. give or offer any payment (sometimes called a facilitation payment) to a government official in any country to facilitate or speed up a routine or necessary procedure;
- 2.5. You must not threaten or retaliate against another person who has refused to offer or accept a bribe or who has raised concerns about possible bribery or corruption.

## 3. Gifts and hospitality

- 3.1. This policy does not prohibit the giving or accepting of reasonable and appropriate hospitality for legitimate purposes such as building relationships, maintaining our image or reputation, or marketing our products and services.

- 3.2. A gift or hospitality will not be appropriate if it is unduly lavish or extravagant, or could be seen as an inducement or reward for any preferential treatment (for example, during contractual negotiations or a tender process).
- 3.3. Gifts must be of an appropriate type and value depending on the circumstances and taking account of the reason for the gift. Gifts must not include cash or cash equivalent (such as vouchers), or be given in secret. Gifts must be given in our name, not your name.
- 3.4. Promotional gifts of low value such as branded stationery may be given to or accepted from existing customers, suppliers and business partners.

## 4. What is modern slavery?

- 4.1. Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour including human trafficking. These forms conspire to deprive a person of their liberty to exploit them for personal or commercial gain by others.
- 4.2. The prevention, detection and reporting of modern slavery in any part of our business and supply chain is the responsibility of all those working at Mtec.
- 4.3. You should report any issue regarding a suspicion of a breach or possible future breach of this policy to any member of the board of Directors or Management Team without delay.
- 4.4. You will be supported with genuine concerns in good faith under this policy, even if those concerns are mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith of their suspicion of the occurrence of modern slavery within our supply chain.

## 5. Record Keeping

- 5.1. You must declare and keep a written record of all hospitality or gifts given or received. You must also submit all expenses claims relating to hospitality, gifts or payments to third parties in accordance with our Expenses Policy and record the reason for expenditure.
- 5.2. All accounts, invoices, and other records relating to dealings with third parties including suppliers and customers should be prepared with strict accuracy and completeness. Accounts must not be kept "off-book" to facilitate or conceal improper payments.

## 6. How to raise a concern

If you are offered a bribe, or are asked to make one, or if you suspect that any bribery, corruption or other breach of this policy has occurred or may occur, you must notify your line manager or Lia Nelissen, or report it in accordance with our Whistleblowing Policy as soon as possible.

## Document Control

Revision	Changes made	Who	Date
0.1	Document creation	Fiona Campbell – Stephenson Law	June 2023
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