



## **Anti-Bribery Policy**

It is our policy to conduct all of our business in an honest and ethical manner and James Jones & Sons Ltd is committed to acting professionally, fairly and with integrity in all our corporate and personal dealings wherever we operate.

The Board of Directors takes a zero-tolerance approach to bribery and corruption and is committed to implementing and enforcing effective systems to mitigate against any breaches.

Employees must comply with all applicable laws, rules and regulations of the company and the jurisdictions in which the Group operates.

### **1. Who is covered by the policy?**

Employees are prohibited from engaging in any form of bribery, whether directly or through a third party, nor are they allowed to accept or receive bribes. This policy applies to all individuals in the Group working at all levels and grades including directors, senior managers, employees (whether permanent, fixed-term or temporary). This policy also covers all consultants, contractors, and any other person providing services to us.

### **2. What is a bribe?**

Bribery includes:

- the act of offering, giving, requesting, promising, accepting, receiving or soliciting something of value or an advantage, with the purpose of inducing or influencing an action or decision; and
- any inducement, reward or object of value offered to or received by another individual with the purpose of gaining an advantage, be it commercial, contractual, regulatory or personal.

### **3. Gifts and hospitality**

This policy does not prohibit the giving and receiving of promotional gifts of low value and normal and appropriate hospitality. However, in certain circumstances gifts and hospitality may amount to bribery and all employees must comply strictly with James Jones & Sons Limited's ethics policy. We will not provide gifts or hospitality with the intention of persuading anyone, internally or externally, to act improperly or unethically.

### **4. Facilitation payments and kickbacks**

We do not make, and will not accept, facilitation payments or "kickbacks" of any kind. Facilitation payments are typically small, unofficial payments made to secure or expedite a routine government action by a government official. Kickbacks are typically payments made in return for a business favour or advantage. All employees must avoid any activity that might lead to, or suggest, that a facilitation payment or kickback will be made or accepted by us.



## 5. Record keeping

We will keep financial records and have appropriate internal controls in place which will evidence the business reason for making any payments to third parties.

All expense claims relating to hospitality, gifts or expenses incurred to third parties must be submitted in accordance with our expenses policy and specifically record the reason for the expenditure.

All accounts, invoices, memoranda and other documents and records relating to dealings with third parties, such as clients, suppliers and business contacts, must be prepared and maintained with strict accuracy and completeness. No accounts must be kept "off-book" to facilitate or conceal improper payments.

## 6. Raising concerns

All employees are encouraged to raise concerns about any issue or suspicion of malpractice at the earliest possible stage. All steps taken by an employee, and all such communications relating thereto, will remain confidential.

The Group will make sure that any notice of violation is carefully examined in order to determine its merits and to take appropriate remedial action. Any violation of this policy is subject to disciplinary sanctions that may include dismissal.

## 7. Monitoring

The effectiveness of this policy will be regularly reviewed by the Board. Whenever necessary, this document will be periodically updated to reflect changes that may have been made to the policies, guidelines and programs of the Group as well as the laws and regulations in effect at the time.

**TOM BRUCE-JONES**  
Chairman

January 2023