

Anti Bribery and Corruption Policy

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Document history

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Overview

This policy outlines the Companies position on preventing and prohibiting bribery to adhere to the high standards we have set for conducting our business affairs. You will find specific guidance in this policy on recognising and addressing bribery and corruption, whether in the UK or overseas.

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.

The policy applies to all employees, contractors, consultants, officers, interns, casual and agency workers, and anyone else under our control. It does not form part of your contract of employment and can be amended or withdrawn at any time.

Our commitment and your obligations

As a Company, we are committed to absolute integrity and fairness across all our operations and accordingly will not tolerate any activities involving bribery or corruption.

If you are employed or engaged by the Company, or in any other way under our control, you are obliged to take responsibility for preventing, detecting, and reporting anything you believe amounts, or could amount, to bribery or corruption.

You must report any conduct or activity that you suspect amounts to bribery or corruption to your manager or a Company director. Please consult our policy on whistleblowing for further information about raising concerns.

You can be confident that the Company will never penalise anyone who refuses to become involved in bribery or corruption or who flags up their concerns to us in good faith. Should you suffer any retributive treatment in this context, you must talk to your manager. You can raise the matter formally under our Grievance Policy if you are not satisfied that it has been resolved informally.

What is bribery

We define bribery as a reward or inducement for acting improperly to gain an advantage, whether personal, commercial, or regulatory. You do not need to have actually given or received the reward or inducement for this process to amount to bribery.

A bribe does not need to involve the promise, or actual payment, of money — offering hospitality, entertainment or gifts can also be classed as bribery if the purpose is to exert influence.

You may face up to 10 years' imprisonment for offering, promising, giving, asking for, or accepting a bribe as this is a criminal offence. We may as a Company also face sanctions if we fail to stop bribery taking place. This can include an unlimited fine and being excluded from public contract tenders.

This list includes the most common actions we consider to be bribery, but it is not exhaustive. You must not become involved in any of them or allow anyone else to become involved on your behalf. They are:

- promising, offering or giving money, hospitality or gifts in the expectation that you will receive a business advantage or because you have already done so
- accepting or giving hospitality or gifts in the course of commercial negotiations of any kind, including tender processes, if there is any doubt about whether doing so could have an impact on the outcome
- accepting money, gifts or hospitality from anyone you suspect is in return seeking a business advantage
- accepting hospitality that is excessively extravagant for the context in which it is offered
- offering gifts without your manager's express approval to government or other officials, political parties, and individual politicians
- receiving gifts without your manager's express approval from government or other officials, political parties, and individual politicians
- offering or receiving gifts in return for the faster or smoother conclusion of a routine transaction or process
- retaliating against or threatening anyone who refuses to bribe a third party
- retaliating against or threatening anyone who raises concerns under the policy
- taking part in any other activity or process that might otherwise breach this policy.

What is corruption?

We define corruption as the abuse of power, authority, or position in return for some personal advantage.

What is allowed

Offering or receiving hospitality and entertainment from third parties is allowed under this policy provided that it is appropriate and reasonable in the circumstances and the purpose is to:

- build or maintain business relationships

- enhance or maintain the Company's reputation
- help market the Company's products and services more effectively.

You may also give and accept gifts, but only if you observe the following conditions:

- you have your manager's prior approval in every case
- you are not giving or receiving the gift in a bid to influence a business decision
- you are not giving or receiving the gift as a reward for new business or retaining existing business
- you are not giving or receiving the gift in return for any other benefits or favours
- you are giving the gift on behalf of the Company and not in your own name
- you are not giving cash or any kind of cash equivalent, such as vouchers
- your gift is appropriate for the context — eg, a small gift offered at Christmas
- your gift is not given in secret
- your action complies with local laws.

It is generally acceptable to give or receive low-value business-related gifts, eg branded umbrellas.

You can reimburse a third party for business-related expenses — the costs of attending a meeting, for example — and you can also accept a third party's offer to pay your expenses. Although this does not normally constitute bribery, any payment made or received that exceeds reasonable or genuine business expenses is not acceptable. An example would be payment for an extended stay in a hotel before or after business had been concluded.

We appreciate that practice varies between countries and regions and what may be normal and acceptable in one region may not be in another. The test to be applied is whether in all the circumstances the gift, hospitality or payment is reasonable and justifiable. The intention behind it should always be considered.

What are kickbacks and facilitation payments

We do not make, and will not accept, facilitation payments or "kickbacks" of any kind.

We define kickbacks as payments made in return for a business advantage or favour.

We define facilitation payments as unofficial payments, usually small, made to speed up or smooth out a routine process or activity. They are sometimes described as 'back-handers', and recipients typically include government or other officials.

You must avoid being put in a position where you might be asked to make or accept a kickback or facilitation payment on the Company's behalf. You must also avoid being put in a position from where it could be inferred that such a payment was available.

If anyone asks you to make a payment on behalf of the Company, you must consider carefully whether what is being asked for is in proportion to the goods or services involved. Always ask for a receipt, and if you have any concerns you must discuss them with your manager without delay.

Keeping Records

You must keep written records of any gifts or hospitality you have given or received and declare these. All associated expenses claims must give full details of the reason for the expenditure and be submitted to the Company using the process laid out in our expenses policy. All hospitality or gifts received will be subject to managerial review.

Invoices and other records relating to third-party dealings, including those with customers and suppliers, should be prepared with strict accuracy and completeness. Accounts must not be kept “off-book” to conceal or facilitate payments of any kind.

Training and Communication

If you have any questions about the content or application of this policy, you should contact the Chief Executive to request training or further information.

Our zero-tolerance approach to bribery and corruption must be communicated to all suppliers, contractors, and business partners at the outset of our business relationship with them and as appropriate thereafter.

Breaches of this Policy

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.