

# Axis – Bribery Act



Measures and procedures to prevent bribery and similar untoward conduct are an intrinsic part of the fabric of Axis Europe plc behavioural guidelines, code of conduct and written policies for carrying out business.

These are common to both direct Axis Europe plc employees and sub-contractors, with any individual or organisation working for or on behalf of Axis Europe plc held to the same high standards of conduct. These guidelines form part of our inductions and tool-box talks as well as general management policies.

Examples of this in practice include:

- Expected behavioural guidelines can be found on the company website. This information is held with the finance team.
- Any gifts received must be immediately reported to a Line Manager for probity, with appropriate action taken.
- Our Supply Accounts Administrators run regular audits of all transactions to ensure all procedures are being followed.
- Appointment of sub-contractors, suppliers and 3<sup>rd</sup> parties follows a set process involving multiple persons to eliminate opportunities for bribery in the supply chain.

Axis Europe plc also operates a formal Whistle-Blowing policy, made available to all personnel, to support this.

Where we have cause for concern, Axis Europe plc's HR team will immediately investigate the individual with appropriate action (e.g., dismissal) taking place as part of a structured review process.



## Current Policy



2010

Axis believes its existing practises are sufficient to ensure compliance with the Bribery Act, however they will be reviewed at regular intervals and amended where it is felt necessary.

Axis will investigate all allegations of a breach of policies and take the appropriate action including reporting to the appropriate authorities where it is deemed necessary.

The following are common situations where a third party might perceive a bribe has been given or received. All employees should note that where a situation arises that is outside of these guidelines they should report it to a member of the Executive Team in the first instance.

Securing new business is generally made by competitive tendering and is governed by UK & EEC regulations or by the tendering rules of individual private companies. No employee is allowed to make any form of payment, either monetary or in kind, as to influence the client or the client's agent into awarding new business. Where an allegation is made that an Axis Europe plc employee is involved in making such a payment this will be investigated and the appropriate actions will be taken.

Purchase of Goods and Services are made at market prices. All employees procuring goods and services do so on this basis. No form of contribution either monetary or in kind can be accepted by an employee from a provider for procuring their goods or services. If such an arrangement is suggested by the provider the member of staff must report this immediately to a member of the Executive Team. Where allegations are made that a contribution has been given to an Axis Europe plc employee in return for purchasing goods and services this will be investigated and the appropriate actions will be taken.

Charitable Contributions are made financially or in kind to an organisation involved with Charitable activities. They are made without expecting to receive anything of value in return. All such donations are signed off by Directors on behalf of Axis Europe plc employees cannot accept payments directly to them on the basis that it is a charitable donation. All such incidents should be reported to a member of the Executive Team.

Political Donations the company does not make political donations nor does it give time off to members of staff for political campaigning.

Expenses claimed are for the reimbursement of travel and other related expenses incurred by an employee in undertaking day to day business on behalf of the company. These are reimbursed in line with the company's current Expenses Policy. Axis Europe plc employees cannot claim for reimbursement outside of these guidelines and cannot accept payments for expenses other than payments made by the company. All such incidents, should they occur, must be reported to a member of the Executive Team.

Commission Payments the company does not generally make commission payments to sales staff or to external parties.

Gifts are given as a mark of appreciation. Tickets to social events where the host is not present is a gift. Gifts are used to market and enhance relationships or promoting the company's name by incorporating the company logo or promotional item such as a calendar. Gifts made by Axis Europe plc can only be approved at Executive Team level. Where a gift is made to an Axis Europe plc employee it must be reasonable in terms of value. The current guideline issued by Her Majesty's Revenue and Customs services is a maximum of £50 in any one year. All employees are expected to adhere to this guideline.



Hospitality is given in the form of meals, receptions, social or sporting events with such activities being given or received to develop business relationships where the host is present. Providing the hospitality is reasonable the current Axis Europe plc expense policy should cover Axis Europe plc employees. Where an employee is treated to hospitality by a third party the hospitality must be reasonable and should not be excessive. Reasonable expense would be, say, an invitation to a UK social event that may include lunch and dinner. Unreasonable expense would be an invitation to the same event but including 5\* hotel accommodation for the weekend plus paid air travel both to and from the event. All hospitality should be signed off by a member of the Executive Team. Any employee offered excessive hospitality by a third party should seek to review this with a member of the Executive Team before proceeding.

Sponsorships are contributions both financial and in kind to an individual or an organisation for promotional purposes. There is an expectation by the sponsor that the recipient will undertake some form of promotion for the sponsor. All sponsorship contributions made by Axis Europe plc must be approved at Executive Team Level and are promoted via the marketing department either via the Axis Europe plc All Areas publication or the company web site. Axis Europe plc does not receive or accept contributions from third parties for promoting their goods or services.

Any employee who is unclear regarding these guidelines and needs further information should contact Rickardo Santana ([rickardo.santana@axiseurope.com](mailto:rickardo.santana@axiseurope.com))

A handwritten signature in black ink, appearing to read 'J Hayes'.

John Hayes  
Chief Executive

11<sup>th</sup> February 2023