



ANTI-BRIBERY AND CORRUPTION POLICY

Introduction

It is our policy to conduct all of our business in an honest and ethical manner. We take a zero tolerance approach to bribery and corruption and are committed to acting professionally, fairly and with integrity in all our business dealings and relationships. We aim to limit our exposure to bribery by:

- Setting out a clear anti-bribery policy;
- Training all employees so that they can recognize and avoid the use of bribery by themselves and others;
- Encouraging employees to be vigilant and to report any suspicion of bribery, providing them with suitable channels of communication and ensuring sensitive information is treated appropriately;
- Rigorously investigating instances of alleged bribery and assisting the police and other appropriate authorities in any resultant prosecution;
- Taking firm and vigorous action against any individual(s) involved in bribery.

The Policy

In accordance with the Bribery Act 2010, PIP prohibits the following:

- the offering, the giving, the solicitation or the acceptance of any bribe, whether cash or other inducement
- to or from any person or company, wherever they are situated and whether they are a public official or body or private person or company
- by any individual employee, agent or other person or body acting on the Companies behalf
- in order to gain any commercial, contractual or regulatory advantage for the Companies in a way which is unethical
- or in order to gain any personal advantage, pecuniary or otherwise, for the individual or anyone connected with the individual
- to review this Policy Statement within one year or when necessary due to changes in working practice or legislation. Following the review revisions will be made as necessary.

Application of the Policy

This policy applies to individual employees, agents, sponsors, intermediaries, consultants or any other people or bodies associated with PIP.

This policy prohibits any inducement which results in a personal gain or advantage to the recipient or any person or body associated with them, and which is intended to influence them to take action which may not be solely in the interests of PIP or of the person or body employing them or whom they represent.

This policy is not meant to prohibit the following practices providing they are customary in a particular market, are proportionate:

- normal and appropriate hospitality
- the use of any recognized fast-track process which is available to all payment of a fee
- the offer of resources to assist the person or body to make the decision more efficiently provided that they are supplied for that purpose only

Inevitably, decisions as to what is acceptable may not always be easy. If anyone is in doubt as to whether a potential act constitutes bribery, the matter should be referred to the Managing Director before proceeding.

This policy statement will be reviewed annually or when necessary due to changes in the work practices or legislation. Following the review revisions will be made if necessary.



Preventing and reporting bribery

All staff has a responsibility to prevent, detect and report bribery. Relevant guidance will be available to support all staff in fulfilling this duty.

If you become aware that an activity or conduct which has taken place which you suspect is a bribe (or corrupt), you have a duty to report this. Any such incidents should be reported directly to the Managing Director, who will ensure confidentiality is maintained.

PROTEK (UK) LTD

Laurentiu P. – General Director

A handwritten signature in black ink that reads "P. Laurentiu". The signature is written in a cursive, slightly stylized font.