

1. Policy Statement

The Group is committed to conducting its business with integrity, transparency and accountability. We adopt a zero-tolerance approach to bribery and corruption in all forms.

We are committed to complying with the Bribery Act 2010 and all applicable anti-corruption legislation in the jurisdictions in which we operate.

Bribery is a criminal offence. Individuals may face imprisonment of up to 10 years and/or unlimited fines. The Group may face unlimited fines, exclusion from public contracts and serious reputational damage.

The Board has overall responsibility for ensuring this policy complies with legal and ethical obligations and that adequate procedures are in place to prevent bribery.

2. Scope

This policy applies to all group employees, affiliated companies, partners, suppliers, sub-contractors, consultants, agents and any other organisations or individuals with whom we do business or who may act on our behalf ("Associated Persons")

Compliance with this policy is a condition of employment and contractual engagement.

3. What Constitutes Bribery

Under the Bribery Act 2010, the following offences are relevant to The Group and its employees:

A general offence of offering or receiving bribes

An offence is committed if a person gives, offers, promises, requests, agrees to receive, or accepts a bribe.

A bribe can include money or any offer, promise or gift of something of value or advantage. It does not need to be of high value. It may include:

- Cash payments
- Gifts or hospitality
- Travel or accommodation
- Political or charitable donations
- Preferential treatment
- Confidential information
- Employment opportunities
- Any other financial or non-financial advantage

It need not be for personal benefit. A donation by a supplier to a favoured charity could constitute a bribe. Intention to improperly influence a decision is key.

The corporate offence of failing to prevent bribery

An offence is committed where a company fails to prevent bribery by a person associated with it who intends to obtain or retain a business advantage for The Group. It is irrelevant whether The Group was aware of or approved the bribery.

It is a defence if The Group can demonstrate that it had adequate procedures in place to prevent bribery.

The offence of bribing a foreign public official

An offence is committed if a person bribes a foreign public official with the intention of influencing them in their official capacity to obtain or retain business or a business advantage.

4. Prohibited Conduct

The Group prohibits:

- The offering, giving, solicitation or acceptance of any bribe, whether cash or other inducement
- To or from any person or organisation, wherever located
- Whether they are a public official, private individual or company
- By any employee or Associated Person acting on the Group's behalf
- In order to gain any commercial, contractual or regulatory advantage
- Or to obtain any personal advantage, financial or otherwise

Market practice or local custom does not justify bribery.

Further Clarification

The Group recognises that market practice varies across the territories in which it does business and what is normal and acceptable in one place may not be in another. 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 the Group 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 and are properly recorded:

- normal and appropriate hospitality (see guidance below)
- the sending of greeting cards, calendars, and small gifts at Christmas
- the use of any recognised fast-track process which is available to all on 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.

5. Gifts and Hospitality

The Group recognises that reasonable and proportionate hospitality may be part of legitimate business practice.

Gifts and hospitality are permitted only where they:

- Are for a legitimate business purpose
- Are proportionate and reasonable
- Are not intended to improperly influence a decision
- Comply with applicable law
- Are transparently declared and recorded

Hospitality expenses need to be pre-authorised by Business Unit Managers before invitations are issued. Reimbursement will be made via the expenses system upon submission of an expenses form and a valid VAT receipt. The following information must be recorded:

Date	Reason	Attendees	Company	CRL Staff	Outcome

Examples of appropriate reasons and outcomes:-

Reason	Outcome
Lunch following meeting to discuss progress on project	Clear understanding of need to accelerate works
Invitation to sporting event	To explain to the guest(s) the full range of The Group's activities.

Cash gifts are strictly prohibited.

Excessive or lavish hospitality, including payment of hotel accommodation or travel costs for clients, is not permitted.

6. Facilitation Payments

A facilitation payment is an unofficial payment made to secure or expedite a routine government action (for example, issuing permits or licences).

Facilitation payments are strictly prohibited, even where such payments are considered customary or routine in a particular country.

7. Associated Persons and Business Partners

The Group will only conduct business with persons and organisations that demonstrate integrity and ethical conduct consistent with this Policy.

Appropriate due diligence may be undertaken before entering into business relationships.

8. Employee Responsibilities & Reporting Concerns

All employees are responsible for:

- Complying with this Policy
- Completing required training
- Following hospitality and expense procedures
- Remaining vigilant to bribery risks
- Preventing, detecting and reporting suspected bribery

Employees must not engage in any activity that could lead to a breach of this Policy.

Any employee who suspects bribery or corruption must report it immediately to a Board Director or the Group HR Executive. Reports will be treated confidentially.

The Group will not tolerate retaliation against anyone who raises concerns in good faith.

Failure to report known or suspected bribery may constitute a disciplinary offence.

If in doubt about whether a particular act constitutes bribery, employees must seek guidance before proceeding.

9. Record Keeping

All accounts, invoices and financial records must be accurate and complete. False, misleading or incomplete records are strictly prohibited.

The Group will maintain appropriate internal controls to prevent and detect bribery.

10. Breaches of this Policy

There are severe penalties for breach of the Bribery Act 2010. These may be an unlimited fine and/or imprisonment for up to 10 years. Furthermore, any failure to comply will cause considerable damage to the reputation and good name of The Group.

The Group considers a breach of this policy to be a serious offence which will be dealt with under the Group disciplinary procedure. Penalties may include summary dismissal.

11. Training and Communication

The Group will:

- Communicate this policy to all employees
- Provide appropriate anti-bribery awareness training
- Ensure key personnel understand their responsibilities
- Make this Policy available to relevant third parties

12. Monitoring and Review

The Group will regularly review this policy and associated procedures to ensure they remain effective, appropriate, and aligned with the Bribery Act 2010 and public sector expectations.

Review

This policy will be regularly reviewed.

Signed



A P Rimoldi
Group Chief Executive

March 2026