

## Revision History

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## Document Control

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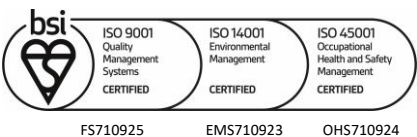


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## Policy Statement

Gel Engineering Ltd prohibits the offering, giving, solicitation or 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 behalf of the Company,
- in order to gain any commercial, contractual or regulatory advantage for the Company in a way that is unethical,
- or in order to gain any personal advantage (pecuniary or otherwise) for the individual or anyone connected with the individual.

This policy prohibits any inducement that 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 that may not be solely in the interests of Gel Engineering or of the person or body employing them or whom they represent.

This policy is not meant to prohibit normal and appropriate hospitality or the giving of a gift on a festival or at another special time, providing they are customary in a particular market, are proportionate and are properly recorded.

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

## Employees' responsibilities

The prevention, detection and reporting of bribery is the responsibility of all employees and Gel Engineering Ltd is committed to:

- encouraging employees to be vigilant and to report any suspicion of bribery.
- providing employees with suitable channels of communication and ensuring that sensitive information is treated appropriately.
- investigating instances of alleged bribery and assisting the police and other appropriate authorities in any resultant prosecution.
- taking disciplinary action against any individual(s) involved in bribery.

Any suspicion of bribery should be reported in confidence to a Director who has overall responsibility for bribery prevention.

## Penalties

The Bribery Act 2010 came into force on the 1st July 2011. Under the Act Bribery by individuals is punishable by up to ten years in prison and/or an unlimited fine. If the business is found to have taken part in the Bribery or is found to lack adequate procedures to prevent Bribery, it too could face an unlimited fine.

**Oisín Gibson**  
Director

**Glyn Weeks**  
Director

**Lee Andrews**  
Director

**Date:**

04.05.2023

**Review Date:**

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