



## Anti Corruption & Bribery Policy

Nueco group review our processes for this policy against the Bribery act 2010.

Nueco Group Limited does not tolerate corruption or bribery in any form. Nueco Group Limited prohibits the offering or payment of bribes, kickbacks or any other improper benefits to actual or potential customers, clients, contractors, suppliers, government officials, employees of these entities or any other party. Similarly, Nueco Group Limited employees shall not demand, arrange or accept bribes, kickbacks or other improper benefits from any entity for the benefit of the employee or the employee's family, friends, associates or acquaintances, or any other person.

This policy has been adopted by Nueco Group Limited's Management. Members of the management team shall implement procedure to ensure compliance with this policy and, as required, shall adopt local policies and procedures stricter than those set forth here. Failure to comply with the provisions of this Policy will result in disciplinary action. The term management refers to any person in a position of responsibility over others.

We price competitively and in line with the market to ensure we are compliant with the Competition Law.

### Guidance to Ensure Compliance with this Policy:

#### Bribes, Kickbacks and Other Improper Benefits

- Payments by or on behalf of Nueco Group Limited which are unlawful under the laws of any country, region, city and/or country, or any jurisdiction.
- Offering, giving, demanding or receiving bribes, payoffs, kickbacks, or other improper payments to or from customers, contractors, agents, agents, suppliers or government officials, employees of these entities, or any other person or entity.
- Payment of rebates or other deviations from normal terms of sale outside of the country where the business is being conducted, where the payments would violate the laws of the country where the business is being conducted.
- Payments by or on behalf of Nueco Group Limited with the intention or understanding that a part or all of such payment is to be used for any purpose other than that described by the document supporting the payment.

#### Gifts, Hospitality and Expenses

Gifts, hospitality and expenses offered to or received from employees of customers or suppliers (including prospective customers or suppliers) must meet the following criteria:

- Gifts, hospitality and expenses shall comply with normally accepted business practices and comply with the policies of the organisation employing the recipient.
- Gifts, hospitality and expenses can only be offered if they are considered legal and comply with generally acceptable ethical practices in the area of operations. Such gifts, hospitality or expenses must be an ordinary social amenity or normal business sales promotion.
- The facts surrounding the gift, hospitality or expenses would not be embarrassing to Nueco Group Limited if disclosed.





- Lavish expenditure shall be avoided when entertaining an employee of a customer, supplier or prospective customer or supplier.
- Nueco Group Limited employees may not accept hospitality, expenses or gifts from customers, suppliers, or prospective customers or suppliers where the cost to the host would appear to be more than is reasonable and customary.
- Nueco Group Limited employees may not accept hospitality, expenses or gifts from any customers, suppliers or prospective customers or suppliers that unduly influence or prejudice the relationship.

### Guidance and Reporting

Whenever in doubt about a particular situation, employees are required to consult with a Manager of a higher rank in the employee's line of reporting and, as necessary, to make an inquiry to other relevant internal persons for guidance. Such guidance must be made in writing. Employees are required to report any actual or potential non-compliance to relevant internal officers, with the assurance that there will be no retaliation or other negative consequences for persons reporting in good faith. Reports of violations of this policy may be submitted anonymously and confidentially to the chairman of the Nueco Group Limited's audit committee.

We have a zero tolerance for bribery and corruption and our finance manager ensures all funds are accounted for and also, we ensure all staff disclose any gifts or beneficial exchanges prior to them happening and if this is not done, then we will act swiftly and strictly.

If you have any suspicion of bribery or corruption going on, please contact [nicholas@nuecogroup.com](mailto:nicholas@nuecogroup.com).

### Guidance on Acceptance of Gifts or Hospitality

Any member of the management team who is offered or accepts any gift or hospitality must record it in the Register of Interests. This is to ensure that any item such as gifts and hospitality is available for scrutiny by external and internal auditors and to ensure no illegal or unethical activities are being undertaken.

It is the responsibility of the person receiving the gift or hospitality to ensure it is recorded in the register failure to do so may lead to disciplinary action. The register of interests will be held in the office for all employees to view should they wish.

"All our company policies are reviewed quarterly to ensure that Nueco Group Limited remains knowledgeable, learned and abreast with the latest industry legislation. We employ highly trained professionals and outsource consultancy where applicable to ensure the highest standard of consultation is received. I personally communicate each policy to all of our members to ensure anyone representing Nueco Group Limited are well briefed, attentive and working safely."

**Tom Gibbons**

**Managing Director**

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