

Technetix Anti-Bribery Policy

Introduction

Technetix is committed to the highest standards of ethical conduct and integrity in its global business activities. This policy outlines Technetix' position on preventing and prohibiting bribery. Technetix will not tolerate any form of bribery by, or of, its employees, agents or consultants or any person or body acting on its behalf. Senior management is committed to implementing effective measures to prevent, monitor and eliminate bribery.

Who does this policy apply to?

This policy applies to all employees and officers of all companies within the Technetix group, and to temporary workers, consultants, contractors and agents acting for, or on behalf of, Technetix ('associated persons') wherever they are located. Every employee and associated person acting for, or on behalf of, Technetix is responsible for maintaining the highest standards of business conduct. Any breach of this policy is likely to constitute a serious disciplinary, contractual and criminal matter for the individual concerned and may cause serious damage to the reputation and standing of Technetix.

Technetix may also face criminal liability for unlawful actions taken by its employees or associated persons under legislation in various countries. All employees and associated persons are required to familiarize themselves and comply with this policy, including any future updates that may be issued from time to time by Technetix.

Definition of Bribery

In this policy, a bribe is a financial or other type of advantage that is offered or requested with the:

- intention of inducing or rewarding improper performance of a function or activity; or
- knowledge or belief that accepting such a reward would constitute the improper performance of such a function or activity.

A relevant function or activity includes public, state or business activities or any activity performed in the course of a person's employment, or on behalf of another company or individual, where the person performing that activity is expected to perform it in good faith, impartially, or in accordance with a position of trust.

Typically a criminal offence will be committed in the geographies that Technetix operate in if:

- an employee or associated person acting for, or on behalf of, Technetix offers, promises, gives, requests, receives or agrees to receive a bribe; or an employee or associated person acting for, or on behalf of, Technetix offers, promises or
- gives a bribe to a foreign public official with the intention of influencing that official in the performance of his/her duties (where local law does not permit or require such influence); and Technetix does not have the defense that it has adequate procedures in place to prevent
- bribery by its employees or associated persons.



What is prohibited?

Technetix prohibits employees or associated persons from offering, promising, giving, soliciting or accepting any bribe. The bribe might be cash, a gift or other inducement to, or from, any person or company, whether a public or government official, official of a state-controlled industry, political party or a private person or company, regardless of where in the world the employee or associated person is situated. The bribe might be made to ensure that a person or company improperly performs duties or functions (for example, by not acting impartially or in good faith or in accordance with their position of trust) to gain any commercial, contractual or regulatory advantage for Technetix in either obtaining or maintaining Technetix business, or to gain any personal advantage, financial or otherwise, for the individual or anyone connected with the individual.

This prohibition also applies to indirect contributions, payments or gifts made in any manner as an inducement or reward for improper performance, for example through consultants, contractors or subcontractors, agents or sub-agents, sponsors or sub-sponsors, joint-venture partners, advisors, customers, suppliers or other third parties.

Records

Employees and, where applicable, associated persons, are required to take particular care to ensure that all company records are accurately maintained in relation to any contracts or business activities, including financial invoices and all payment transactions with clients, suppliers and public officials.

Due diligence should be undertaken by employees and associated persons prior to entering into any contract, arrangement or relationship with a potential supplier of services, agent, consultant or representative in accordance with Technetix' procurement and risk management procedures.

Employees and associated persons are required to submit accurate and detailed records of all corporate hospitality, entertainment or gifts accepted or offered using the appropriate form. The form should be submitted to the Chief Financial Officer who keeps a confidential register of all corporate hospitality, entertainment or gifts accepted or offered.

Territorial risks

Principle

Employees and associated persons conducting business on behalf of Technetix in certain countries may be at greater risk of being exposed to bribery or unethical business conduct. For the purposes of the Technetix risk assessment, the [Transparency International](#) rating system has been used to assess which countries present the most risk. Those countries rated 50 or less are believed to have a serious corruption problem. Employees and associated persons owe a duty to Technetix to be extra vigilant when conducting business in these countries.

Procedure

Employees and associated persons are required to cooperate with Technetix' risk management procedures and to report suspicions of bribery to the Chief Financial Officer. While any suspicious circumstances should be



reported, employees and associated persons are required particularly to report:

- close family, personal or business ties that a prospective agent, representative or joint-venture partner may have with government or corporate officials, directors or employees;
- a history of corruption in the country in which the business is being undertaken;
- requests for cash payments;
- requests for unusual payment arrangements, for example via a third party;
- requests for reimbursements of unsubstantiated or unusual expenses; or
- a lack of standard invoices and proper financial practices.

If an employee or associated person is in any doubt as to whether or not a potential act constitutes bribery, the matter should be referred to the Chief Financial Officer.

Facilitation payments

Principle

Technetix prohibits its employees and associated persons from making or accepting any facilitation payments. These are payments made to government officials for carrying out or speeding up routine procedures. Facilitation payments are distinct from an official, publicly available fast-track process. Facilitation payments, or offers of such payments, will constitute a criminal offence by both the individual concerned and Technetix under the UK's Bribery Act 2010, even where such payments are made or requested outside of the UK. Employees and associated persons are required to act with greater vigilance when dealing with government procedures in higher risk countries.

Procedure

Where a public official has requested a payment, employees or associated persons should ask for further details of the purpose and nature of the payment in writing. If the public official refuses to give these, this should be reported immediately to the Chief Financial Officer.

If the public official provides written details, the Chief Financial Officer will consider the nature of the payment. Local legal advice may be sought by Technetix.

If it is concluded that the payment is a legitimate fee, for example part of a genuine fast-track process, or is permitted locally, Technetix will authorize the employee to make the payment.

Where the Chief Financial Officer considers that the request is for a facilitation payment, the employee or associated person will be instructed to refuse to make the payment and notify the public official that the employee or associated person is required to report the matter to Technetix.

Technetix will seek the assistance of the relevant employee in its investigation and may determine that the matter should be referred to the relevant authorities.

If an employee or associated person has any other concerns about the nature of a request for payment, he/she



should report it to the Chief Financial Officer using the reporting procedure set out in this policy and in accordance with the [Technetix Whistleblowing Policy](#).

Corporate entertainment, gifts, hospitality and promotional expenditure

Principle

Technetix permits corporate entertainment, gifts, hospitality and promotional expenditure where these are:

- for the purpose of establishing or maintaining good business relationships;
- to improve the image and reputation of Technetix; or
- to present Technetix' goods/services effectively;

provided that it is:

- arranged in good faith, and
- not offered, promised or accepted to secure an advantage for Technetix or any of its employees or associated persons or to influence the impartiality of the recipient.

Technetix will authorize only reasonable, appropriate and proportionate entertainment and promotional expenditure.

Procedure

Employees and, where relevant, associated persons should submit requests for proposed hospitality and promotional expenditure well in advance of proposed dates to their relevant Executive.

Employees are required to set out in writing:

- the objective of the proposed client entertainment or expenditure;
- the identity of those who will be attending;
- the organization that they represent; and
- details and rationale of the proposed activity.

Technetix will approve business entertainment proposals only if they demonstrate a clear business objective and are appropriate for the nature of the business relationship. Technetix will not approve business entertainment where it considers that a conflict of interest may arise or where it could be perceived that undue influence or a particular business benefit was being sought (for example, prior to a tendering exercise).

Any gifts, rewards or entertainment received or offered from clients, public officials, suppliers or other business contacts should be reported immediately to the Chief Financial Officer. In certain circumstances, it may not be appropriate to retain such gifts or be provided with the entertainment and employees and associated persons may be asked to return the gifts to the sender or refuse the entertainment, for example, where there could be a real or perceived conflict of interest. As a general rule, small tokens of appreciation, such as flowers or a bottle of wine, may be retained by employees.



If an employee or associated person wishes to provide gifts to suppliers, clients or other business contacts, prior written approval from the relevant Executive is required, together with details of the intended recipients, reasons for the gift and business objective. These will be authorized only in limited circumstances and must be reported to the Chief Financial Officer.

Employees and, where applicable, associated persons must supply records and receipts, in accordance with Technetix Group Travel & Expenses Policy.

Charitable and political donations

Technetix considers that charitable giving can form part of its wider commitment and responsibility to the community. Technetix supports a number of charities that are selected in accordance with objective criteria, following a risk assessment. Technetix may also support fundraising events involving employees.

What practices are permitted?

This policy does not prohibit:

- normal and appropriate hospitality and entertainment with clients (please see Technetix Group Travel & Expenses Policy); and
- the use of any recognized fast-track process that is publicly available on payment of a fee.

Any such practices must be proportionate, reasonable and made in good faith. Clear records must be kept.

Risk management

Principle

Technetix has established detailed risk management procedures to prevent, detect and prohibit bribery. Technetix will conduct risk assessments for each of its key business activities on a regular basis and, where relevant, will identify employees or officers of Technetix who are in positions where they may be exposed to bribery.

Procedure

Technetix will identify high-risk areas, for example projects undertaken in high-risk countries, tenders for work and those working on high-value projects. Employees and associated persons are required to comply with Technetix' procurement and risk management procedures when commencing a new project.

Technetix will:

- regularly monitor 'at risk' employees and associated persons;
- regularly communicate with 'at risk' employees and associated persons;
- undertake appropriate due diligence of third parties and associated persons; and
- communicate its zero-tolerance approach to bribery to third parties, including actual and prospective customers, suppliers and joint-venture partners.



Reporting suspected bribery

Principle

Technetix depends on its employees and associated persons to ensure that the highest standards of ethical conduct are maintained in all its business dealings. Employees and associated persons are requested to assist Technetix and to remain vigilant in preventing, detecting and reporting bribery.

Employees and associated persons are encouraged to report any concerns that they may have to the Chief Financial Officer as soon as possible. Issues that should be reported include:

- any suspected or actual attempts at bribery;
- concerns that other employees or associated persons may be being bribed; or
- concerns that other employees or associated persons may be bribing third parties, such as clients or government officials.

Procedure

Employees should raise any incidents of suspected bribery with their line manager or the Chief Financial Officer. Any such reports will be thoroughly and promptly investigated by the Chief Financial Officer in the strictest confidence. Employees and associated persons will be required to assist in any investigation into possible or suspected bribery.

Employees will also be required to comply with the [Technetix Whistleblowing Policy](#).

Employees or associated persons who report instances of bribery in good faith will be supported by Technetix. Technetix will ensure that the individual is not subjected to detrimental treatment as a consequence of his/her report. Any instances of detrimental treatment by a fellow employee because an employee has made a report will be treated as a disciplinary offence. An instruction to cover up wrongdoing is itself a disciplinary offence. If told not to raise or pursue any concern, even by a person in authority such as a manager, employees and associated persons should not agree to remain silent. They should report the matter to the Chief Financial Officer.

Objectives

To uphold the highest standards of integrity and compliance, Technetix has set the following objectives.

- Ensure 100% completion of mandatory anti-bribery and anti-corruption training for all employees, with new employees required to complete the training within their first month.
- Achieve full compliance with the Technetix Whistleblowing Policy, ensuring all reported concerns are acknowledged and responded to within five days.
- Ensure all suppliers agree to the Supplier Code of Conduct.
- Conduct anti-bribery and anti-corruption assessments for 100% of high-risk suppliers, with further due diligence where risks, flags or findings indicate the need for deeper evaluation.



Action by Technetix

Technetix will fully investigate any instances of alleged or suspected bribery. Employees suspected of bribery may be suspended from their duties while the investigation is being carried out. Technetix will invoke its disciplinary procedures where any employee is suspected of bribery, and proven allegations may result in a finding of gross misconduct and immediate dismissal. Technetix may terminate the contracts of any associated persons, including consultants or other workers who act for, or on behalf of, Technetix who are found to have breached this policy.

Technetix may also report any matter to the relevant authorities, including the Director of Public Prosecutions, Serious Fraud Office, Revenue and Customs Prosecutions Office and the police. Technetix will provide all necessary assistance to the relevant authorities in any subsequent prosecution.

Responsibilities

- The Chief Financial Officer and Group General Counsel are responsible for the implementation of this policy.
- **All Technetix employees** are responsible for understanding and adhering to this policy, completing all required training, and promptly reporting any suspected breaches, concerns, or unethical conduct through the appropriate channels.
- The **Risk Committee** is responsible for overseeing the effective implementation of this policy, including the periodic review of compliance, investigation and monitoring of any reported non-compliance, and reviewing the outcomes of supplier assessments and due diligence activities.
- The **Executive Team and the Board** are accountable for approving, endorsing, and championing this policy, ensuring that adequate resources, governance, and leadership support are in place to maintain a robust anti-bribery and anti-corruption framework.

Review of procedures and training

Technetix will regularly communicate its anti-bribery measures to employees and associated persons.

Technetix will set up training sessions where applicable.

Employees and those working for, or on behalf of, Technetix are encouraged to contact the Group General Counsel with any suggestions, comments or feedback that they may have on how these procedures may be improved.

This policy will be reviewed at least annually. Technetix reserves the right to amend and update this policy as required.