



## THIRD PARTY COMPLIANCE CODE OF CONDUCT

As a Company, we are committed to ensuring that all our activities, including manufacturing, marketing, sales and distribution of our products, meet or exceed the standards of the jurisdictions in which we conduct our business. The Company is fully committed to operating its business honestly, professionally and with integrity. As such, the Company and all Affiliates are committed to conducting its activities free from the illegal and improper influence of bribery or corruption and takes a zero-tolerance approach to tax evasion or the facilitation of tax evasion, whether under UK law or under the law of any foreign country. The highest standard of ethical behaviour is expected from any consultants, representatives, agents, brokers, distributors, and other intermediaries, or third parties with which the Company or any Affiliate enters into a joint venture, partnership, investment, teaming arrangement or other business combination and business partners throughout the world ("**Third Parties**") when they are acting on behalf of the Company or any Affiliate and in their own personal conduct.

In particular:

- Third Parties shall be committed to operating lawfully, ethically and with integrity.
- Third Parties shall not engage in any acts to evade tax, facilitate tax evasion by another person (including an Affiliate), or provide assistance to anyone who they know or suspect is engaged in tax evasion.
- Third Parties shall not tolerate, permit or engage in any form of bribery or corruption, whether in the commercial or public sector.
- Third Parties shall not make any facilitation or grease payments i.e. payments to officials as a way of ensuring that they perform, either more promptly or at all, the tasks which they should in any event be undertaking.
- Third Parties shall have a written contract with the Company or an Affiliate (the "**Contract**") which includes the Company's anti-bribery and corruption and anti-facilitation of tax evasion contractual provisions and clearly sets out the level of any remuneration.
- Third Parties will not, in the course of their work for the Company, offer or accept any hospitality, gift or sponsorship where this would violate any anti-bribery laws, other applicable laws or this Code of Conduct. Third Parties should, in particular, take account of whether any gift, hospitality or sponsorship would be seen as lavish or excessive and must ensure that they do not give rise to an appearance of impropriety. No gift or hospitality shall be offered to any Government Officials<sup>1</sup> without the prior approval of the Company.

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<sup>1</sup> As defined in the Contract.

- Third Parties should only charge the Company or an Affiliate fees and expenses for legitimate services which it has rendered. The level of any such fees or expenses shall be as agreed in writing in the Contract, unless a variation has been expressly agreed between the parties and documented in writing. All payments will be made by the Company or Affiliate directly into an account in the Third Party's name and within the Third Party's country of residence and the country where the services were rendered.
- Third Parties will not engage or use any sub-contractors, sub-agents or other third parties in connection with their work for the Company, unless they have received prior written authorization from the Company.
- Third Parties will respond promptly and honestly to any requests made by the Company or an Affiliate company in the context of its anti-bribery and anti-facilitation of tax evasion due diligence. This may include but is not limited to completing a Third Party Due Diligence Questionnaire; and attending interviews and anti-bribery and corruption and anti-facilitation of tax evasion training.
- Third Parties shall maintain adequate books and records. The Company reserves the right to check/ audit Third Parties' compliance with this Code of Conduct upon the giving of reasonable notice. Third Parties will cooperate fully with such investigation and/or audit.
- The Company reserves the right to terminate contractual relationships with any Third Party who works with or for the Company and breaches this Code of Conduct and any applicable anti-bribery and corruption and/ or anti-facilitation of tax evasion contractual provisions.
- Third Parties shall implement suitable procedures within their business to enable their employees to report any instances of bribery, tax evasion (or facilitation thereof) or suspicious behaviour.
- Third Parties shall adequately train their staff to understand their obligations with regards to this Code of Conduct and how to report any instances of bribery, tax evasion (or facilitation thereof) or suspicious behaviour. Any such reports shall be thoroughly investigated internally.
- Third Parties shall vigorously enforce compliance with this Code of Conduct and shall take disciplinary action against any employees who breach this Code of Conduct.
- Where Third Parties become aware of any potential act of bribery, tax evasion (or facilitation thereof) or suspicious behaviour involving work performed on behalf of or in connection with the Company or an Affiliate Company, it should report this to the Group's CCO whose contact details are as follows:

**Julian Henley-Price**  
**[Julian.Henley-Price@survitecgroup.com](mailto:Julian.Henley-Price@survitecgroup.com)**

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