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## **Anti-Bribery / Corruption Policy**

SRC Infrastructure values its reputation for ethical behaviour, financial probity and reliability and has a zero tolerance policy towards bribery.

The Company prohibits the offering, the giving, the solicitation or the acceptance of any bribe, whether cash or other inducement, to or from any person or company, public or private, by any directors, staff, contractors, consultants, agents, overseas agents, external examiners and any non-employee service providers engaged on Company business for whatever reason, in order to gain any commercial, contractual or regulatory advantage for the Company in a way which is unethical or in order to gain any personal advantage, pecuniary or otherwise, for the individual or anyone connected with the individual.

Our Company has a zero tolerance policy towards any behaviour that constitutes bribery, under the definition given above, and has put in place procedures for reporting and investigating acts of suspected bribery. Our Company has taken steps to limit the risk of bribery through:

- (a) Setting out a clear anti-bribery policy;
- (b) Training employees so that they can recognise and avoid the use of bribery by themselves and others;
- (c) Encouraging employees to be vigilant and to report any suspicion of bribery, providing them with suitable channels of communication and ensuring sensitive information is treated appropriately;
- (d) Rigorously investigating alleged bribery, where necessary assisting appropriate authorities;
- (e) Taking firm and vigorous action against any individual(s) involved in bribery;
- (f) Monitoring of the effectiveness of such controls.

The responsibility to control the risks of unethical business practices occurring resides at all levels of the organisation. The prevention, detection and reporting of bribery is therefore the responsibility of all staff.

### **Further Clarification**

This policy is not meant to prohibit the following practices providing they are customary in a particular market, are proportionate and are properly recorded:

- (a) Appropriate and reasonable hospitality
- (b) The giving of a ceremonial gift on a festival or at another special time
- (c) The use of any recognised fast-track process which is available to all on payment of a fee
- (d) 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.

The Company prohibits payments including "facilitating" or "expediting" payments to others in order to secure prompt or proper performance of routine duties.

Inevitably, decisions as to what is acceptable may not always be easy. If anyone is in doubt as to whether a potential act constitutes bribery, the matter should be referred to the local senior manager with responsibility for this policy before proceeding.

Signed



**Vasileios Vernikos**  
**Executive Director**