



Anti-Bribery Policy

LTi Metaltech is committed to complying with the Bribery Act 2010 in our business activities in the UK and overseas.

A bribe is money, gifts or any other benefit that is offered or asked for in order to:

- Influence someone to act dishonestly or unfairly in their job role, or
- As a reward for doing so, knowing that it's dishonest or improper

A relevant role or activity means any work carried out for the government, under law, in business, as part of someone's job, or on behalf of another person or organisation. In all these cases, you would be expected to act honestly, fairly and with integrity.

A criminal offence will be committed if:

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

What is prohibited?

Employees or associated persons are prohibited 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 organisation, whether a public or government official, official of a state-controlled industry, political party or a private person or organisation, regardless of whether the employee or associated person is situated in the UK or overseas.

The bribe might be made to ensure that a person or organisation 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 a:

- commercial, contractual or regulatory advantage for LTi in either obtaining or maintaining organisation business, or
- 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 sub-contractors, agents or sub-agents, sponsors or sub-sponsors, joint-venture partners, advisors, customers, suppliers or other third parties.

Records

Employees are required to take particular care to ensure that all 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 our procurement and risk management procedures.

Working Overseas

Employees conducting business on behalf of our organisation outside the UK may be at greater risk of being exposed to bribery or unethical business conduct than UK-based employees. Employees and associated persons owe a duty to our organisation to be extra vigilant when conducting international business.

Employees are required to cooperate with our risk management procedures and to report suspicions of bribery to their line manager, the Finance Director or the Managing Director. 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 their line manager, the Finance Director or the Managing Director.

Facilitation Payments

Employees or associated persons are prohibited from making or accepting any facilitation payments. These are payments made to government officials for carrying out or speeding up routine procedures. They are more common overseas. 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 our organisation, even where such payments are made or requested overseas. Employees and associated persons are required to act with greater vigilance when dealing with government procedures overseas.

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 their line manager, the Finance Director or the Managing Director.

If the public official provides written details, the Finance Director and the Managing Director will consider the nature of the payment. Local legal advice may be sought.

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

If it is decided 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 our organisation and the UK embassy.

We will seek the assistance of the relevant employee in our 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, they should report it to their line manager, the Finance Director or the Managing Director, using the reporting procedure set out in this policy and in accordance with our Whistleblowing Policy.

Corporate Entertainment, Gifts, Hospitality and Promotional Expenditure

LTi Metaltech permits corporate entertainment, gifts, hospitality and promotional expenditure that is undertaken:

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

provided that it is:

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

We will authorise only reasonable, appropriate and proportionate entertainment and promotional expenditure.

This principle applies to employees, whether based in the UK or overseas. However, those with remits overseas may be given further training on the specific procedures that they are required to follow.

Employees should submit requests for proposed hospitality and promotional expenditure well in advance of proposed dates to their line manager, the Finance Director or the Managing Director.

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 organisation that they represent; and
- details and rationale of the proposed activity.

We will approve business entertainment proposals only if they demonstrate a clear business objective and are appropriate for the nature of the business relationship. We 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 their line manager, the Finance

Director or the Managing Director. 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 chocolates or a bottle(s) of wine, should be passed to the HR Team for inclusion in a raffle the Company carries out each December.

If an employee wishes to provide gifts to suppliers, clients or other business contacts, prior written approval from a director of the business is required, together with details of the intended recipients, reasons for the gift and business objective. These will be authorised only in limited circumstances and will be subject to a cap of £50 per recipient.

Employees must supply records and receipts, in accordance with our Expenses Policy.

Charitable and Political Donations

Our organisation considers that charitable giving can form part of its wider commitment and responsibility to the community. We support a number of charities that are selected in accordance with objective criteria, following a risk assessment. We 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 our Expenses policy); and
- the use of any recognised 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.

Reporting Suspected Bribery

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

Employees are encouraged to report any concerns that they may have to their line manager, the Finance Director or the Managing Director 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.

Employees should record any incidents of suspected bribery and send to HR@lti-metaltech.com. Any such reports will be thoroughly and promptly investigated, in the strictest confidence, by the directors of the business and the HR department and with the line manager

if appropriate, in the strictest confidence. Employees and associated persons will be required to assist in any investigation into possible or suspected bribery.

Employees or associated persons who report instances of bribery in good faith will be supported. We will ensure that the individual is not subjected to detrimental treatment as a consequence of their 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 either the HR department, their line manager or a Director of the business, whichever they feel is most appropriate.

When an individual reports suspected instances of bribery, we will process any personal data collected in accordance with our [GDPR](#) policy. Data collected from the point at which the individual makes the report is held securely and accessed by, and disclosed to, individuals only for the purposes of dealing with the report of bribery.

Action by our organisation

We 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. We will invoke disciplinary procedures where any employee is suspected of bribery, and proven allegations may result in a finding of gross misconduct and immediate dismissal. We may terminate the contracts of any associated persons, including consultants or other workers who act for, or on behalf of, our organisation who are found to have breached this policy.

We may also report any matter to the relevant authorities, including the Serious Fraud Office and the police. We will provide all necessary assistance to the relevant authorities in any subsequent prosecution.