

Bribery Policy

This Bribery Policy provides guidance as to how to conduct our everyday business relationships with our different stakeholders. This Policy will assist you in identifying and managing the most obvious ethical situations and making ethical business decisions.

The highest standards of integrity and ethics are essential to the Company's continuing success. The Company expects each of its employees, suppliers, contractors and consultants to be aware of and refer to this Policy in all of their business activities worldwide.

No document can cover all potential situations where ethical issues may arise. Certain situations, called 'ethical dilemmas', require careful consideration before action. Such situations:

- when the right thing to do is unclear;
- when two or more values (such as fairness, loyalty, efficiency, honesty, competitiveness) are in conflict; and/or
- when people will be impacted negatively, no matter what decision is taken.

What to do if you are unsure?

If it feels wrong, it probably IS wrong. When you're unsure, ask for guidance from your line manager, who should contact the General Counsel and Company Secretary for further guidance.

Bribery, Corruption and Gifts

The Company conducts its business in an open, honest and above-board manner, and does not seek to exercise improper influence on suppliers, customers, government officials, prospective employees or any other person doing business or wishing to do business with the Company. We want to prevent even the appearance of such influence and require all employees, suppliers, contractors and consultants to do the same and to comply with the following:

1. not to solicit or pay bribes, for any purpose, including obtaining or retaining business;
2. avoid being placed in situations where one's judgement might be influenced or appears to be influenced by improper considerations;
3. not to pay or accept any 'kickbacks' from a supplier or contractor.

The Company is subject to a number of laws and regulations from different countries that apply as a result of its conduct of operations, stock exchange listing, etc. We expect all employees, suppliers, contractors and consultants to conduct business on our behalf in compliance with the provisions of these laws.

We do not accept or give gifts, favours, hospitality, personal advantages, services payments, loans, or benefits of any kind, other than those of nominal value. When an employee is responsible for buying or leasing materials for the Company, the employee should be even more conscious in this

respect, and guard their objectivity. If you are unsure, ask for guidance from the General Counsel and the Company Secretary or refrain from giving/receiving the gift.

A gift of 'nominal value' would certainly not exceed £250 in value.

Conflicts of interest

The Company, its employees, suppliers, contractors and consultants should avoid situations where personal interests could conflict or could appear to conflict with their contractual duties and responsibilities to the Company.

Suppliers, consultants and contractors

Suppliers, consultants and contractors are chosen on the basis of appropriate criteria, including qualifications, timeliness, deliverability, product or service quality, price and benefit to our operations and approved by the Tender Committee. Consultants, suppliers and contractors must have a written contract with the Company and their use must be within the principles of Aurelian Sustainability policy. Commissions or fees must be reasonable in relation to the value of the work performed.

Observance of the Bribery Policy

Everybody who works at the Company is personally accountable for learning, endorsing, promoting and applying this Policy to their own conduct and field of work.

Actions that violate these standards will result in disciplinary action, up to and including termination of employment or contract and, if appropriate, possible legal action. Directing or pressuring others to violate one of these standards, failure to properly report policy violations or retaliation against an employee for reporting a concern or violation will also result in the same.

We expect our suppliers, contractors, consultants and contractors to conduct their business with the Company in accordance with the principles outlined in this Policy. Lack of compliance may result in termination of the contract.