

Anti-Corruption & Anti-Bribery

About this policy

As a company, it's our policy to conduct all of our business in an honest and ethical manner. We take a zero-tolerance approach to bribery and corruption and are committed to acting professionally, fairly and with integrity in all our business dealings and relationships. We take our legal obligations, including those under the Bribery Act 2010, very seriously.

Any employee who breaches this policy may face disciplinary action, which could result in dismissal for gross misconduct. Any non-employee who breaches this policy may have their contract terminated with immediate effect.

This policy does not form part of any employee's contract of employment or other contract to provide services, and we may amend it at any time. It will be reviewed regularly.

Who must comply with this policy?

This policy applies to all persons working for the everplay group of companies, including all subsidiaries of everplay Group plc (the 'Group') or on its behalf in any capacity and wherever located, including employees at all levels, company directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners. You must ensure that you read, understand and comply with this policy.

Training

Anyone working for the Group is required to complete annual anti-corruption and anti-bribery training.

What is bribery?

- 'Bribe' means a financial or other inducement or reward for action which is illegal, unethical, a breach of trust or improper in any way. Bribes can take the form of money, gifts, loans, fees, hospitality, services, discounts, the award of a contract or any other advantage or benefit.
- 'Bribery' includes offering, promising, giving, accepting or seeking a bribe.
- It is a criminal offence to offer, promise, give, request, or accept a bribe. Individuals found guilty can be punished by up to ten years' imprisonment and/or a fine and employers that fail to prevent bribery can face an unlimited fine and damage to its reputation.
- All forms of bribery and corruption are strictly prohibited. If you are unsure about whether a particular act constitutes bribery, raise it with your manager or a member of the HR department. Specifically, you must not:
 - give or offer any payment, gift, hospitality or other benefit in the expectation that a business advantage will be received in return, or to reward any business received (sometimes called a kickback);
 - accept any offer from a third party that you know or suspect is made with the expectation that we will provide a business advantage for them or anyone else;

- give or offer any payment (sometimes called a facilitation payment) to a government official in any country to facilitate or speed up a routine or necessary procedure;
- threaten or retaliate against another person who has refused to offer or accept a bribe or who has raised concerns about possible bribery or corruption.

Gifts and hospitality

- This policy does not prohibit the giving or accepting of reasonable and appropriate hospitality for legitimate purposes such as building relationships, maintaining our image or reputation, or marketing our products and services.
- A gift or hospitality will not be appropriate if it is unduly lavish or extravagant, or could be seen as an inducement or reward for any preferential treatment (for example, during contractual negotiations or a tender process).
- Gifts must be of an appropriate type and value depending on the circumstances and taking account of the reason for the gift. Gifts must not include cash or cash equivalent (such as vouchers), or be given in secret. Gifts must be given in our name, not your name.
- Promotional gifts of low value such as branded stationery may be given to or accepted from existing customers, suppliers and business partners.

Declaring hospitality and gifts & record-keeping

- You must declare and keep a written record of all hospitality or gifts given or received. You must also submit all expenses claims relating to hospitality, gifts or payments to third parties in accordance with our expenses policy and record the reason for expenditure.
- All accounts, invoices, and other records relating to dealings with third parties including suppliers and customers should be prepared with strict accuracy and completeness. Accounts must not be kept "off-book" to facilitate or conceal improper payments.

How to raise a concern

- If you are offered a bribe, or are asked to make one, or if you suspect that any bribery, corruption or other breach of this policy has occurred or may occur, you must report it in accordance with our Whistleblowing Policy as soon as possible.