

ANTI-BRIBERY & CORRUPTION STATEMENT







Reconomy's zero tolerance approach to bribery and corruption

Reconomy is committed to the highest legal and ethical standards. This must be reflected in every aspect of the way in which we operate, by all Reconomy employees and third parties acting for and on behalf of Reconomy at every level of the organisation.

Reconomy has a zero tolerance approach to bribery and corruption in all of our relationships and business activities as part of our commitment to conduct business in an honest and responsible way.

Reconomy does not, and will not, accept and pay bribes or offer improper inducements or anything that could be perceived as such. Reconomy expects the same from its customers, business partners and third parties that perform services or deliver business on its behalf.

Reconomy is committed to the following:

- 1. All forms of bribery and corruption, including facilitation payments, are strictly prohibited.
- 2. Gifts or hospitality must always be proportionate, reasonable and have a legitimate purpose.
- 3. All gifts and hospitality must be registered in the Gifts & Hospitality registers; transparency is key.
- 4. Employees and associated third parties may not make gifts or donations to political parties.
- 5. Senior management is responsible for setting proper tone at the top, thereby fostering a culture in which bribery and corruption is never acceptable.
- 6. Completing effective risk assessments to pinpoint areas where bribery and corruption risks are faced, allowing better evaluation and mitigation of these risks.
- 7. Charitable contributions must only be made to bona fide charities so they cannot be used to conceal a bribe.
- 8. Maintaining transparent and accurate books, records and financial reporting.
- 9. Providing training to empower employees to recognize, prevent and report instances of bribery.

Speaking up and reporting

Reconomy employees and third parties acting for and on behalf of Reconomy are responsible for speaking up whenever they have identified any potential or actual breach and for reporting it immediately to management, or via the whistleblower reporting channels.

Signed:

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Name: Guy Wakeley

Position: Chief Executive Officer

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