

## ANTI-BRIBERY POLICY

### Introduction

Nuclei Ltd values its reputation for ethical behaviour and for financial probity and reliability. It recognises that over and above the commission of any crime, any involvement in bribery will also reflect adversely on its image and reputation. Its aim therefore is to limit its exposure to bribery by:

- Setting out a clear anti-bribery policy
- Establishing and implementing anti-bribery procedures as appropriate
- Communicating this policy and any relevant procedures to employees and to others who will perform services for Nuclei Ltd
- Undertaking appropriate due diligence measures before engaging others to represent Nuclei Ltd in its business dealings
- Monitoring and reviewing the risks and the effectiveness of any anti-bribery procedures that are in place

### Policy

Nuclei Ltd prohibits the offering, giving, solicitation or acceptance of any bribe (whether cash or other inducement)

- To or from any person or company (wherever they are situated and whether they are a public official or body or private person or company)
- By any individual employee, agent or other person or body acting on behalf of Nuclei Ltd
- In order to gain any commercial, contractual or regulatory advantage for Nuclei Ltd in a way that is unethical
- Or in order to gain any personal advantage (pecuniary or otherwise) for the individual or anyone connected with the individual

## ANTI-BRIBERY POLICY CONTINUED

This policy prohibits any inducement that results in a personal gain or advantage to the recipient or any person or body associated with them, and which is intended to influence them to take action that may not be solely in the interests of Nuclei Ltd or of the person or body employing them or whom they represent.

This policy is not meant to prohibit normal and appropriate hospitality or the giving of a gift on a festival or at another special time, providing they are customary in a particular market, are proportionate and are properly recorded.

Inevitably, decisions as to what is acceptable may not always be easy. If you are in any doubt as to whether a potential act constitutes bribery, the matter should be referred to the General Manager before proceeding.

### **Employees' responsibility**

The prevention, detection and reporting of bribery is the responsibility of all employees and Nuclei Ltd is committed to:

- Encouraging employees to be vigilant and to report any suspicion of bribery
- Providing employees with suitable channels of communication and ensuring that sensitive information is treated appropriately
- Investigating instances of alleged bribery and assisting the police and other appropriate authorities in any resultant prosecution
- Taking disciplinary action against any individual(s) involved in bribery

You must inform the General Manager of any gifts received by a client, supplier or any other third party associated with Nuclei Ltd.

Any suspicion of bribery should be reported in confidence to the Director who has overall responsibility for bribery prevention.

**Name:** Harry Wilkinson

**Signature:** 

**Date:** Jan 2022

**Position:** General Manager

**Review:** Jan 2023