

Anti-Bribery and Corruption Policy of AFC Europe

Scope

This policy applies to all individuals working at all levels and grades, including senior managers, directors, employees (whether permanent, fixed-term or temporary), consultants, contractors, and any other person providing services to us.

Purpose

Acts of bribery or corruption are designed to influence an individual in the performance of their duty and incline them to act in a way that a reasonable person would consider to be dishonest in the circumstances.

Bribery can be defined as offering, promising or giving a financial (or other) advantage to another person with the intention of inducing or rewarding that person to act or for having acted in a way which could be considered improper. Corruption is any form of abuse of entrusted power for private gain and may include, but is not limited to, bribery.

Bribes are not always a matter of handing over cash. Gifts, hospitality and entertainment can be bribes if they are intended to influence a decision.

Principles

Gifts and Hospitality

This policy does not prohibit giving and receiving promotional gifts of low value and normal and appropriate hospitality. However, in certain circumstances, gifts and hospitality may amount to bribery, and all employees must comply strictly with AFC Europe Ltd.'s ethics policy in respect of gifts and hospitality.

If you are in doubt as to whether a possible act might be in breach of this policy or the law, the matter should be referred to your Manager, or if necessary, guidance should be sought from a Director. We will not provide gifts or hospitality with the intention of persuading anyone to act improperly

Facilitation payments and kickbacks

AFC Europe Ltd do not make, and will not accept, facilitation payments or "kickbacks" of any kind. Facilitation payments are typically small, unofficial payments made to secure or expedite a routine government action by a government official. Kickbacks are typically payments made in return for a business favour or advantage.

All employees must avoid any activity that might lead to, or suggest, that a facilitation payment or kickback will be made or accepted by us.

Donations

We do not make contributions of any kind to political parties. No charitable donations will be made for the purpose of gaining any commercial advantage.

Record Keeping

- We will keep financial records and have appropriate internal controls in place which will evidence the business reason for making any payments to third parties.

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- All expense claims relating to hospitality, gifts or expenses incurred to third parties must be submitted in accordance with our expenses policy and specifically record the reason for the expenditure.
- All accounts, invoices, memoranda and other documents and records relating to dealings with third parties, such as clients, suppliers and business contacts, must be prepared and maintained with strict accuracy and completeness. No accounts must be kept “off-book” to facilitate or conceal improper payments.

Raising Concerns

Employees will be encouraged to raise concerns about any issue or suspicion of malpractice at the earliest possible stage. No employee will suffer any detriment as a result of raising genuine concerns about bribery, even if they turn out to be mistaken. **AFC Europe Ltd** will investigate thoroughly any actual or suspected breach of this policy. Employees found to be in breach of this policy may be subject to disciplinary action which may ultimately result in their dismissal.

Penalties

The Bribery Act 2010 came into force on 1st July 2011. Under the act, bribery by individuals is punishable by up to ten years’ imprisonment and/or an unlimited fine. If **AFC Europe Ltd** was found to have taken part in the bribery or is found to lack adequate procedures to prevent bribery, it too could also face an unlimited fine.

Monitoring

The effectiveness of this policy will be regularly reviewed by the Board. Internal control systems and procedures will be subject to audit under the internal audit process.



Signed

Name :- Keith Kentish

Title:- Executive Vice President

Date :- 04 August 2025

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