

Anti-Bribery & Corruption Policy



ERIKS Industrial Services (Irl) Limited – Anti-Bribery & Corruption Policy

Last Reviewed: 11th November 2020

ERIKS Industrial Services (Irl) Limited (the "**ERIKS Ireland**") is committed to applying the highest standards of ethical conduct and integrity in its business activities. Every employee and individual acting on ERIKS Ireland's behalf is responsible for conducting company business honestly and professionally. ERIKS Ireland considers that all forms of corruption have a detrimental impact on business by undermining good governance and distorting free markets. ERIKS Ireland benefits from carrying out business in a transparent and ethical way and by helping to ensure that there is honest, open and fair competition in our sectors. Where there is a level playing field, ERIKS Ireland can lead the market through innovation and by delivering excellent services and products to its customers.

ERIKS Ireland does not tolerate any form of corruption by, or of, its employees or any persons or companies acting for it or on its behalf, including its directors, managers, secretaries (or any person purporting to act in those capacities), shadow directors or any employees, agents or subsidiaries of ERIKS Ireland (the "**Relevant Persons**"). The Board and senior management are committed to implementing and enforcing effective systems to prevent, monitor and eliminate all forms of corruption in accordance with the Criminal Justice (Corruption Offences) Act 2018 (the "**Act**").

ERIKS Ireland has issued an Anti-Bribery and Corruption Policy ("**Policy**") with the aim of taking reasonable steps to avoid acts of corruption. This Policy applies to all employees and other Relevant Persons and they are required to familiarise themselves and comply with this Policy.

WHAT ACTS ARE PROHIBITED BY THIS POLICY?

Relevant Persons are prohibited from engaging in:

- a. **active and passive corruption:** this means directly or indirectly corruptly offering, giving, agreeing to give, requesting, accepting, obtaining or agreeing to accept a gift, consideration or advantage as an inducement to, or reward for or otherwise on account of, doing an act in relation to one's office, employment, position or business. 'Corruptly' includes acting with an improper purpose personally or by influencing another person, whether:
 - by means of making a false or misleading statement;
 - by means of withholding, concealing, altering or destroying a document or other information; or
 - by other means.
- b. **active and passive trading in influence:** this means directly or indirectly corruptly offering, giving, agreeing to give, a gift, consideration or advantage in order to induce another person to exert an improper influence over an act of an official in relation to the office, employment, position or business of that official.
- c. **giving a gift, consideration or advantage that may be used to facilitate offence:** this means giving a gift, consideration or advantage to another person where the first-mentioned person knows, or ought reasonably to know, that the gift, consideration or advantage, or a

part of it, will be used to facilitate the commission of an offence under the Act.

- d. creating or using a false document:** this means directly or indirectly creating or using a document that a person knows or believes to contain a statement which is false or misleading in a material particular, with the intention of inducing another person to do an acting relation to their office, employment, position or business to the prejudice of the last-mentioned person or another person.
- e. intimidation:** this means directly or indirectly, by himself or herself or with another person, threatening to harm an individual with the intention of corruptly influencing that person or another person to do an act in relation to the person's office, employment, position or business.

For the purposes of this Policy, a-e above, along with any other act of corruption, are referred to as "**Acts of Corruption**".

GIFTS AND HOSPITALITY

Employees and other Relevant Persons acting for or on behalf of ERIKS Ireland are strictly prohibited from making, soliciting or receiving any unauthorised payments or engaging in Acts of Corruption. As part of its anti-corruption measures, ERIKS Ireland is committed to engage only in transparent, proportionate, reasonable and bona fide hospitality and promotional expenditure. This Policy does not prohibit the giving or accepting of reasonable and appropriate hospitality for legitimate purposes such as building service provider or client relationships. Gifts must be of an appropriate type and value depending on the circumstances and taking account of the reason for the gift. Gifts, if any, given by a Relevant Person in the context of their engagement with ERIKS Ireland, must be given in the name of ERIKS Ireland, not in the name of the Relevant Person.

RECORD-KEEPING

Relevant Persons must declare and keep a written record of all hospitality or gifts given or received in the context of their engagement with ERIKS Ireland. Relevant Persons must also submit all expenses claims relating to hospitality provided, gifts given, or payments made to third parties in the context of their engagement with ERIKS Ireland.

All accounts, invoices, and other records relating to dealings with third parties including suppliers and customers should be prepared with accuracy and completeness.

HOW TO RAISE A CONCERN

If a Relevant Person suspects an Act of Corruption has occurred or is unsure about whether an act constitutes an Act of Corruption, they must raise the issue with ethics.compliance@eriks.com as soon as possible.

CONSEQUENCES FOR FAILURE TO COMPLY WITH THIS POLICY AND THE ACT

A breach of this Policy by an employee or other Relevant Person will be treated as grounds for disciplinary action, which may result in a finding of gross misconduct and summary dismissal.

Employees and other Relevant Persons acting for ERIKS Ireland should note that Acts of Corruption are criminal offences that may result in imprisonment of up to ten years and/or an unlimited fine for the Relevant Person and/or an unlimited fine for ERIKS Ireland.