

Univesco Anti-Corruption Policy

1. Introduction

Univesco is committed to conducting its business in an ethical and honest manner and is committed to implementing and enforcing systems that ensure bribery is prevented. Univesco has zero tolerance for bribery and corrupt activities and shall uphold all laws relating to anti-bribery and corruption in all the jurisdictions in which we operate.

2. Purpose

The purpose of this policy is to establish controls to ensure compliance with all applicable anti-bribery and corruption regulations, and to ensure that Univesco's business is conducted in a socially responsible manner.

3. Scope

This policy applies to all employees, directors, officers, consultants, contractors, and agents of Univesco, collectively referred to as "Associates" in this policy.

4. Definition of Bribery

Bribery refers to the offering, promising, giving, accepting, or soliciting of an advantage as an inducement for action which is illegal, unethical, or a breach of trust. Inducements can take the form of gifts, loans, fees, rewards, or other advantages.

5. Policy Statements

5.1. Prohibition of Bribery and Corruption

Univesco prohibits Associates from offering, promising, giving, soliciting, or accepting 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 Associate, agent, or other person or body acting on Univesco's behalf.

5.2. Facilitation Payments

Facilitation payments are unofficial payments made to public officials to secure or expedite actions. Univesco prohibits making or accepting, directly or indirectly, any facilitation payments of any kind.

5.3. Gifts and Hospitality

Univesco permits the offering and accepting of gifts and hospitality only if they are customary, reasonable, and not intended to influence decision-making. All gifts and hospitality must be recorded and reported in accordance with company procedures.

5.4. Charitable Contributions and Sponsorships

Univesco only makes charitable donations and sponsorships that are legal and ethical under local laws and practices. Contributions must not be made to secure any business advantage.

6. Responsibilities

6.1. Management

The management of Univesco is responsible for ensuring that this policy is communicated and implemented effectively throughout the organization. They must ensure that adequate procedures are in place to prevent bribery and corruption.

6.2. Employees and Associates

All Associates are required to read, understand, and comply with this policy. They must avoid any activity that might lead to, or suggest, a breach of this policy.

6.3. Reporting

Any Associates who become aware of, or suspect, any instance of bribery or corruption must report it to their manager or through the whistleblowing procedure.

7. Record Keeping

Univesco will maintain detailed and accurate records of all financial transactions, including gifts, hospitality, donations, and sponsorships, to demonstrate compliance with this policy.

8. Training and Communication

Univesco will provide training to all employees to ensure they understand this policy and the risks of bribery and corruption. The policy will be communicated to all business partners, suppliers, and contractors at the outset of business relations and as appropriate thereafter.

9. Monitoring and Review

Univesco will regularly monitor and review the effectiveness of this policy and its procedures to ensure it remains appropriate and effective. Internal control systems and procedures will be subject to regular audits to provide assurance that they are effective in countering bribery and corruption.

10. Consequences of Non-Compliance

Failure to comply with this policy may result in disciplinary action, up to and including dismissal. Univesco reserves the right to terminate contractual relationships with third parties if they breach this policy.

11. Policy Governance

This policy is endorsed by the Board of Directors of Univesco and is reviewed annually or as required to ensure its relevance and effectiveness.

This policy is designed to provide a comprehensive framework for preventing corruption and bribery within Univesco and ensure compliance with relevant UK laws.