

Anti-Bribery and Corruption Policy

Our approach

We are committed to conducting our business in an open, honest and ethical manner and we take a zero-tolerance approach to all forms of bribery and corruption. We will not condone under any circumstances the offering, receiving or facilitation of bribes or any form of improper payments and we will always adhere strictly to relevant laws in relation to corruption.

A record of all relevant entertainment, hospitality and gifts given or received should be recorded in our Gifts and Entertainment Register which is retained by each Business Unit. Gifts offered and received are intended for the UDG employee's use and should not be passed on to individuals who are not UDG employees.

Do not provide or receive payments or gifts, entertainment or favours if this could lead to you or someone else misusing their position or performing their job improperly.

The value of all gifts given to or received from a single person/supplier should not exceed \$100 in any 12 month period unless authorised by your business unit Managing Director;

The aggregate value of all gifts given or received should not exceed \$250 in any 12 month period unless authorised by your business unit Managing Director.

Policy Statement

The giving or receiving of reasonable gifts and entertainment is permitted, but only if the guidelines set out below are followed:

1. They are intended only to foster legitimate business relations;
2. Their nature, their timing and the circumstances in which they are given, are not capable of either improperly influencing the recipient or being perceived as improperly influencing them;
3. The rules or laws applying to the recipient, particularly if they are public officials, will not be breached by the giving of the gift or entertainment.

Rule # 1

Do not offer, promise or give payments. Gifts or entertainment may be provided up to allowed limits

Rule # 2

Do not request, agree to or accept payments. Gifts or entertainment may be accepted up to allowed limits

Rule # 3

Do not provide gifts, entertainment or facilitation payments to public officials

Where to Get Help

Anti-bribery and corruption laws can be complicated. We understand that sometimes it can be difficult to know what is okay and what is not. If you are ever in any doubt then the first thing you should do is stop and ask. Contact someone in the Compliance Team (details on the *ComplianceCentre*) or the Legal Team. Also, take a look at the resources available on the *ComplianceCentre*

If you know, suspect or are just worried that something is going wrong, you must report it. If you feel uncomfortable doing this, tell one of the Confidential Reporting Team or call our confidential reporting hotline, full details of which are on the *ComplianceCentre*.

