

**PO 005**

ANTI FRAUD, BRIBERY & CORRUPTION POLICY

Agricultural Requisites & Mechanizations Limited is committed to minimising financial crime and in particular to preventing, detecting, investigating and reporting fraud and bribery.

Agricultural Requisites & Mechanizations Limited conducts its business with honesty and integrity and as a result promotes an organisational culture from the top down that will not tolerate any act of fraud or bribery.

This policy is designed to reduce the risk within Agricultural Requisites & Mechanizations Limited of fraud, bribery and other criminal acts being committed by employees, customers, suppliers and all other stakeholders and if such acts are committed, such acts then going unreported. This policy should be read in conjunction with the Whistle Blowing Policy.

This policy applies to all persons employed or engaged by Agricultural Requisites & Mechanizations Limited and all suppliers and customers.

Introduction

Bribery is a criminal offence. The Company prohibits any form of bribery. We require compliance, from everyone connected with our business, with the highest ethical standards and anti-bribery laws applicable. Integrity and transparency are of utmost importance to us and we have a zero tolerance attitude towards corrupt activities of any kind, whether committed by employees or by third parties acting for or on behalf of the Company.

Offences

It is a criminal offence to:

- offer a bribe;
- accept a bribe;
- bribe a foreign official;
- as a commercial organisation, to fail to prevent a bribe.

You should be aware that if you are found guilty by a court of committing bribery, you could face up to 10 years in prison and/or an unlimited fine. The Company could also face prosecution and be liable to pay a fine.

Purpose

The purpose of this policy is to convey to all employees and interested parties of Agricultural Requisites and Mechanizations Ltd the rules of the Company in relation to our unequivocal stance towards the eradication of bribery and our commitment to ensuring that Agricultural Requisites and Mechanizations Ltd conducts its business in a fair, professional and legal manner.

Definitions

For the purposes of this policy, the following words shall have the following meaning:

'fraud' means an intentional act by an individual or group of individuals among management, those charged with governance, employees or third parties, involving the use of deception, breach of confidence or misrepresentation to obtain unjust, dishonest or illegal benefit or advantage to which they are not entitled.

Examples of fraud include:

- falsifying documents or records in order to directly receive a payment or for a payment to be made to a third party in return for some benefit.
- Material and deliberate misstatement of financial performance



- Accepting or providing bribes or kickbacks in return for business with a customer, business partner or supplier
- Creating fictitious sales in order to meet targets
- Use of company or customer data for personal gain.

'Bribery' means where a person offers, promises or gives a financial or other advantage, for example:

- Intending to advantage to induce someone to perform a relevant function or activity improperly by, for example, awarding a contract that they might not otherwise have awarded
- Intending the advantage to reward the recipient for the improper performance of such function or activity.
- Knowing or believing that accepting the advantage would itself constitute the improper performance of a function or activity.

These lists are not exhaustive.

Scope

This policy applies to all employees of Agricultural Requisites and Mechanizations Ltd, regardless of seniority or site. It also extends to anyone working for or on our behalf e.g. those engaged by us on a self-employed basis or an agency arrangement.

We will encourage the application of this policy where our business involves the use of third parties e.g. suppliers and contractors.

Policy Summary

It is prohibited, directly or indirectly, for any employee or person working on our behalf to offer, give, request or accept any bribe i.e. gift, loan, payment, reward or advantage, either in cash or any other form of inducement, to or from any person or Company in order to gain commercial, contractual or regulatory advantage for the Company, or in order to gain any personal advantage for an individual or anyone connected with the individual in a way that is unethical.

It is also prohibited to act in the above manner in order to influence an individual in his capacity as a foreign public official. You should not make a payment to a third party on behalf of a foreign public official.

If you are offered a bribe, or a bribe is solicited from you, you should not agree to it unless your immediate safety is in jeopardy. You should immediately contact a Senior Manager so that action can be taken if considered necessary. You may be asked to give a written account of events.

If you, as an employee or person working on our behalf, suspect that an act of bribery, or attempted bribery, has taken place, even if you are not personally involved, you are expected to report this to a Senior Manager. You may be asked to give a written account of events.

Appropriate checks will be made before engaging with suppliers or other third parties of any kind to reduce the risk of our business partners breaching our anti-bribery rules.

The Company will ensure that all of its transactions, including any sponsorship or donations given to charity, are made transparently and legitimately.

Agricultural Requisites and Mechanizations Ltd takes any actual or suspected breach of this policy extremely seriously and will carry out a thorough investigation should any instances arise.

We will uphold laws relating to bribery and will take disciplinary action against any employee, or other relevant action against persons working on our behalf or in connection with us, should we find that an act of bribery, or attempted bribery, has taken place. This action may result in your dismissal if you are an employee, or the cessation of our arrangement with you if you are self-employed, an agency worker, contractor etc, followed by referral to the police and civil action.



Staff are reminded of the Company’s Whistleblowing Policy which is available in the Employee Handbook, and in BMS 25.

Gifts and hospitality

We realise that the giving and receiving of gifts and hospitality where nothing is expected in return helps form positive relationships with third parties where it is proportionate and properly recorded. This does not constitute bribery and consequently such actions are not considered a breach of this policy.

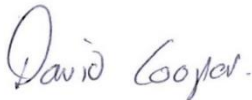
Gifts include money; goods (flowers, vouchers, food, drink, event tickets when not used in a hosted business context); services or loans given or received as a mark of friendship or appreciation.

Hospitality includes entertaining; meals or event tickets (when used in a hosted business context) given or received to initiate or develop relations. Hospitality will become a gift if the host is not present.

No gift should be given nor hospitality offered by an employee or anyone working on our behalf to any party in connection with our business without receiving prior written approval from a Senior Manager. Similarly, no gift nor offer of hospitality should be accepted by an employee or anyone working on our behalf without receiving prior written approval from a Senior Manager.

A record will be made of every instance in which gifts or hospitality are given or received.

As the law is constantly changing, this policy is subject to review and the Company reserves the right to amend this policy without prior notice.

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|  Signed: _____ David Cooper, Managing Director | | Dated 29/03/2022 | |
| Author | Peninsula | Date Doc. Created | 29/03/2022 |
| Approved | DJC | Issue | 6 |
| Department | HR | Next Review Date | 29/03/2024 |