

## Anti-bribery Policy

Pico Technology believes that it is important for the company and its employees to maintain high ethical standards to preserve its reputation in the marketplace.

Pico expects all those employed by and associated with the company to comply with requirements of the Bribery Act 2010 as set out in the policy below. This is a condition of your employment and failure to do so may result in disciplinary action.

Good ethics are important to ensure that Pico meets not only its objectives in a fair and equitable manner but its wider social responsibilities externally. In addition, Pico is committed to ensuring high ethical standards within the workplace.

Pico and its Directors are committed to the prevention of bribery by those employed and associated with it. Pico is committed to carrying out business fairly, honestly, and openly, with no tolerance of bribery.

The HR Manager is responsible for monitoring the anti-bribery policy. Should you have a concern or question then please raise this with the HR Manager.

### Offering bribes

Pico expressly prohibits any person employed by or associated with it from offering, promising, or giving any financial or other advantage to another person where it is intended or believed that the acceptance of the advantage offered, promised, or given constitutes the improper performance of a relevant function or activity.

### Accepting bribes

Pico expressly prohibits any person employed by or associated with it from requesting, agreeing to receive, or receiving any financial or other advantage with the intention that a relevant function should be performed improperly because of the advantage or as a reward for performing the relevant function improperly.

The improper performance of a relevant function in anticipation of receiving financial or other advantage is also prohibited.

### Bribing a public official

Pico expressly prohibits the bribing of a UK or foreign public official to obtain or retain business or an advantage in the conduct of business.

### Relevant functions and activities

Relevant functions and activities are any function of a public nature, any activity connected with the business, any activity performed during a person's employment and activity performed by or on behalf of a body of persons where the person performing that function or activity is expected to perform it impartially, in good faith, or is in a position of trust by virtue of performing it.

### Hospitality and business gifts

The Bribery Act 2010 does not seek to prohibit reasonable and proportionate hospitality, advertising, sponsorship and promotional or other similar business expenditure, as it is recognised that this constitutes an established and important part of doing business. However, hospitality, promotional and similar business expenditure can be used as bribes.

Pico expressly prohibits the giving and receiving of hospitality, business gifts and similar where the intention in doing so is to receive or confer an advantage in return for giving or receiving the hospitality, business gift or similar. This does not apply to proportionate hospitality to maintain or develop a business relationship.

The following procedures must be adopted in relation to hospitality and business gifts.

- All offers of business gifts must be referred to the HR Manager and must only be accepted if clearance has been received from them.
- Business gifts must not be made without the permission of the HR Manager.
- A record of all business gifts made and received and the reason for the gift will be retained by the HR Department.
- All hospitality must be proportionate and reasonable and in line with Pico's hospitality policy. Guidance must be sought from the HR Manager as to whether the planned hospitality is proportionate and reasonable.
- A record of all hospitality provided and accepted, including cost and the reason for providing or accepting the hospitality will be retained by the HR Manager.
- Quid pro quo arrangements are expressly prohibited.
- Cash gifts are expressly prohibited.
- The provision or acceptance of entertainment of a sexual nature is expressly prohibited.
- Acceptable hospitality and entertaining may include modest meals with people with whom we do business (such as providing a modest lunch after a meeting) or the occasional provision of or attendance at sporting or cultural events, provided that the intention is to build business relationships rather than to receive or confer an advantage.
- The provision of small promotional gifts, such as diaries, or similar items, will generally be regarded as acceptable; any items should be handed to one of the HR team for storing in the stationery cupboard until Christmas (when a raffle is usually conducted).
- Employees reviewing expense claims must be alert to the provision of hospitality or business gifts that may be construed as bribes.

### **New business, change in business and contracts with external parties**

Where you develop or seek to develop new avenues for business or new contracts, or where the nature of the business changes, you should inform your line manager of this in order that due diligence and a risk assessment of the circumstances can be undertaken.

Where a business relationship with an external party is sought or newly established, or the nature of the relationship is changed, appropriate due diligence must be exercised to ensure that there are no circumstances giving rise to a concern. That external party must also be made aware of this anti-bribery policy.

### **Facilitation payments**

Facilitation payments are small bribes that are paid to speed up or facilitate government action. Although they are commonplace in some foreign countries, they are regarded as bribes and are illegal under the Bribery Act 2010. Pico expressly prohibits facilitation payments of any sort. Any employee placed under pressure to make a facilitation payment must refer the matter to the HR Manager immediately.

### **Reporting concerns**

You have a responsibility to prevent, detect and report all instances of bribery. You should therefore be alert to the possibility of bribery. If you have a concern please speak to the HR Manager in the first instance. All reports will be treated with the utmost confidentiality. However, concerns can be reported anonymously to the HR Manager.

### **Sanctions**

Pico treats breaches of the anti-bribery policy with maximum seriousness and will investigate any potential breach in accordance with the disciplinary policy. The ultimate sanction for a breach of the policy will be summary dismissal for gross misconduct.