

Anti-Bribery and Corruption Policy

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1. Introduction

This antibribery policy sets out the responsibilities of Envirovent and all those who work for Envirovent regarding observing and upholding our zero-tolerance position on bribery and corruption and it exists to act as a source of information and guidance for colleagues to recognise and deal with bribery and corruption issues.

2. Scope

Envirovent is committed to conducting business in an ethical and honest manner and is committed to implementing an enforcing system that ensure bribery is prevented.

Envirovent will constantly uphold all laws relating to anti-bribery and corruption in all jurisdictions in which we operate. We are bound by laws of the UK including the bribery Act 2010 regarding our conduct both home and abroad.

3. Policy

This anti-bribery policy applies to all employees, or any other person or persons associated with us including third parties our or any of our subsidiaries or their employees no matter where they are located within or outside of the UK.

In the context of this policy, third party refers to any individual or organisation Envirovent meets and works with and refers to actual and potential clients, customers, supplier distributors, business contacts.

a. Definition of bribery

Bribery means offering, promising, giving, accepting or requesting anything of value to inappropriately influence a decision or action.

Examples of something of value include cash, services, offers of employment, charitable donations, political contributions, travel and / or entertainment expenses, meals and gifts.

Bribery is also a risk outside of work and can happen when family members are influenced, for example, if a supplier sends extravagant gifts to your family at the same time the supplier is tendering for business with Envirovent.

b. Public Officials

Under the UK bribery laws, bribery of foreign public officials (e.g. government officials) is a specific crime and the rules are very strict. Colleagues and those acting on our behalf must be particularly careful when dealing with public officials. Any activity that constitutes an attempt to bribe a public official, or which may give that impression, is prohibited at Envirovent.

c. Third parties and associated persons

An associated person is a third party that performs services for or on behalf of Envirovent.

The definition of an associated person is broad and could include franchisees, subcontractors, consultants, and suppliers if they perform services for or on behalf of Envirovent. Envirovent may be liable if an associated person commits an act of bribery on behalf of Envirovent, even if Envirovent was not aware that the associated party has paid the bribe.

d. Facilitation Payments

Facilitation payments are small bribes that are paid to speed up an administrative process, such as the issuing of a permit or license by a local authority. Such payments are prohibited under this policy, irrespective of where they are given.

e. Political and charitable contributions

We have no political affiliations, and we do not make political donations. Donations to charities associated with public officials and their families represent a significant risk for bribery and should be carefully considered.

f. Gifts, hospitality and entertainment

In certain situations, gifts, hospitality and entertainment can be an appropriate and effective way to build and maintain business relationships. However, you must never give or receive gifts with the aim of influencing a business outcome. This may constitute a bribe, cause a conflict of interest or damage the reputation of Envirovent.

Any invitations for hospitality or entertainment, whether given or received, should be proportionate and not be excessive in value. Please refer to our Corporate Gifts and Hospitality Policy.

g. Compliance

It is important that you comply with this policy and related guidance. A breach of UK bribery laws can result in a formal investigation by the Serious Fraud Office who have the power to impose unlimited fines and / or 10 years imprisonment.

Failure to comply with this policy may result in disciplinary action being taken against any colleagues concerned.

h. Raising a concern and reporting of sensitive matters

If you suspect that a breach of this policy has occurred or may occur in the future, please speak to your line manager or the People Team.

You can also report any violations to our independent whistleblowing channel held by S&P: <https://www.solerpalau.com/en-en/whistleblowing-channel/>

It is an anonymous channel, only S&P Group's Compliance Committee have access; depending on the nature of the allegation it may be then sent to Envirovent for investigation.

i. Training and communication

Envirovent will provide training on this policy as part of new employee's induction. All employees will receive regular training and will be asked to formally accept that will comply with this policy.

The policy and our zero-tolerance attitude will be clearly communicated to all our suppliers, contractors, business partners and third parties at the outset of all business relations.

4. Related Documents / Appendices

- Corporate Gifts and Hospitality Policy
- S&P Code of Conduct
- Whistleblowing Policy

Signed by:

A handwritten signature in black ink, appearing to read 'AMakin'.

Andrew Makin
Managing Director
Date: 01/11/2024