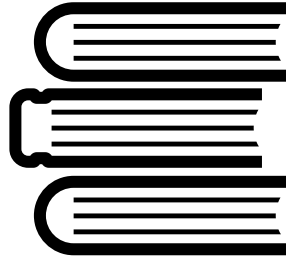




SPOOK

Company Policies



ANTI-BRIBERY AND CORRUPTION POLICY

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ANTI-BRIBERY AND CORRUPTION POLICY

Spook has a strict zero tolerance policy towards bribery and corruption. This policy sets out the standards of behaviour Spook expects from its employees and agents.

Main Areas

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INTRODUCTION

One of Spook's key assets is our standing as an industry leader and the trust we share with our customers. All Spook employees must ensure that their work ensures we do everything to maintain this.

One of the ways we achieve this is through strict compliance with all laws and regulations. Even before the introduction of the Bribery Act 2010 Spook has regularly reviewed its business practices. This is done not only to comply with the laws but also to protect our reputation and to uphold our commitment to carrying out business fairly, honestly and openly, in accordance with the highest ethical standards.

POLICY

The UK Bribery Act 2010* sets out the minimum framework we expect.

Therefore:

- Individuals working for Spook must never request or accept a bribe
- They must never offer, promise or give a bribe
- No individual will suffer, demotion, penalty or other adverse consequences for refusing to pay or receive bribes, even if the refusal may result in the company losing business

COMPLIANCE

This policy applies to anyone who is employed by, or who performs services for, or on behalf of Spook. The founding Directors of Spook ensure all employees, agents and third parties representing Spook services are aware of Spook's commitment to the Act and its standards as set out in the UK Government's electronically published guidance which can be found @: <https://www.gov.uk/government/publications/bribery-act-2010-guidance>

WHAT IS BRIBERY AND CORRUPTION?

An example of bribery is promising, offering, giving, requesting or accepting any advantage to encourage or reward improper behaviour.

- An advantage can be any kind of benefit or anything of value, or perceived value to the person being offered the bribe – it does not have to involve money.
- Improper behaviour is behaviour which is illegal, dishonest or a breach of duty.

> Bribery

A bribe can be made direct or through a third person. It is still an offence to make a bribe, even if it is turned down or fails to have the intended effect.

> Corruption

This can be achieved by abuse of your position within Spook, or if someone else abuses the power or position associated with their role, for personal benefit.

> Individual responsibilities

Everyone must follow standards of behaviour that minimise the risk of bribery. All dealings with customers and suppliers must be open, transparent and conducted appropriately, following Spook's business processes. This will ensure that no bribery or corruption takes place and it will avoid any appearance or suggestion that either Spook or you as an employee/agent of Spook have behaved improperly.

You must:

- Comply with this policy.
- Keep proper, accurate and complete records.
- Report any concerns immediately to the joint founding directors.

You must not:

- Promise, offer or give a bribe in any form.
- Request or accept a bribe.
- Allow a private interest to influence your work for Spook or fail to disclose a connection to a person or business Spook is doing business with.

> Gifts and Hospitality

From time to time employees may be invited to a hospitality event. All such invitations should be reported to your manager and permission given before they are accepted.

If you receive or are offered gifts from suppliers or clients you should inform your manager and they will decide if this can be accepted. If the gift is accepted, it will normally be placed in a "Company pool" which will be distributed by Spook.

The key question to ask yourself is 'Do I expect the business relationship to be improperly influenced as a result of the gift or hospitality?'

> Reporting Concerns

Anyone who has any concerns or requires any guidance or clarification of the above should direct their enquiry to one of the co-founding directors of Spook. These are:

- Martin Luck
- Andrew des'Ascoyne

Any such requests will be dealt with care and in adherence with this policy.

For more information regarding this policy please contact us and we will address each query accordingly.

- End -