



BPPL Holdings PLC – Policy on Anti-Bribery and Corruption

1. Purpose

This policy applies to everyone and every party associated with BPPL, its subsidiaries and affiliates. All Employees, Consultants, Directors, and Board members (collectively hereinafter referred to as 'Company Personnel') are required to fully comply with this Policy and the provisions of all applicable anti-bribery and corruption laws.

Compliance with this policy and laws are a condition of continued employment or association with BPPL group, and violations will not be tolerated. Any alleged breach will be investigated and disciplinary action taken as appropriate in line with the detailed internal process laid out.

Failure by Company personnel to comply with this policy may expose the Company to substantial risk and could jeopardize its operations and reputation. Employees should also be aware that violations of certain anti-bribery and corruption laws may subject individual Company personnel to both criminal penalties, including prison sentences, and civil liability.

Company personnel are prohibited from giving or offering bribes, kickbacks, or similar payment or consideration of any kind, whether at home or abroad, to/from any person or entity (including but not limited to any customers or potential customers, government officials, political party, candidates for political office or any intermediaries, such as agents, attorneys or consultants) in order to:

1. Influence official acts or decisions of that person or entity,
2. Obtain or retain business or a business advantage for, or direct business to, the Company; and/ or secure any improper advantage. Similarly, BPPL does not accept and does not condone the acceptance or receipt of bribes from anyone,
3. Obtain or retain business or a business advantage for, or direct business to, the offer or of the bribe and/or any entity that he/she represents,
4. Secure any improper advantage for the offer or of the bribe and/or any entity that he/she represents.

Company personnel are also prohibited from providing or receiving gifts, meals, entertainment or anything of value to or from any person or entity in connection with Company business unless it is provided or received in accordance with the BPPL Code of Conduct, the Company's Policy on Gifts, Entertainment and Other Benefits.



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This Policy does not merely apply to the person who pays the bribe or offers a token of value, but it extends to anyone who has taken action in furtherance of the same. For example, this policy could apply to anyone who:

- Approves or authorizes the payment,
- Creates or accepts false invoices,
- Relays email instructions to pay or accept a bribe or kickback,
- Covers up an illegal payment,
- Knowingly cooperates in the payment of a bribe, or
- Suspects an illegal payment or kickback but turns a 'blind eye' to it.

2. Compliance with the Policy

It is the responsibility of all Managers and Executives to ensure compliance with this policy in each division. However, all employees have an obligation to act with integrity and to ensure that they understand and comply with the policy. Ongoing compliance will be monitored and reported by Internal Audit.

Training will be provided to relevant employees throughout the group to support them in complying with their responsibilities.