

GENR8ing the future of cleantech innovation



Anti-Bribery Policy



For more information visit www.ecogenr8.com

EcoGenR8 Limited registered at Unit 12
Stratfield Park | Elettra Avenue | Waterlooville |
Hampshire | PO7 7XN

Company number 7455556

VAT registration number GB112217371

Anti-Bribery Policy statement

This Policy applies to all persons working for EcoGenR8 Limited and its trading divisions, AFECO and Innov8 Products (the **Company**) or on its behalf in any capacity, including employees at all levels, directors, agency workers, seconded workers, agents, contractors and suppliers (**workers**).

This Policy takes into account and supports the policies, procedures and requirements documented in the Company's Management Systems, compliant with the requirements of ISO 9001:2015, ISO 14001:2015 and ISO 45001:2018. The implementation and operation of these management systems underlines its commitment to this Policy.

This Policy is in line with the Bribery Act of 2011 as well as being an integral part of the Company's commitment to its Code of Conduct and Corporate Social Responsibility (**CSR**), as described in its dedicated CSR and Code of Conduct Policy.

It is the Policy of the Company to prohibit directly or indirectly the offering, the giving, the solicitation or the acceptance of any bribe, gift, loan, payment or reward, either in cash or any other form of inducement:

- To or from any person or Company, wherever they are situated and whether they are a public official or body or private person or Company;
- By any individual employee, agent or other person or body acting on the Company's behalf;
- In order to gain any commercial, contractual or regulatory advantage for the Company in a way which is unethical;
- Or in order to gain any personal advantage, pecuniary or otherwise, for the individual or anyone connected with the individual.

The Company expects that its suppliers will hold, in turn, their own suppliers to the same high standards.

Further clarification

The Company accepts that normal and acceptable business practices may vary across the territories and organisations in which its business operates.

This Policy prohibits any inducement between the Company's workers and any person which is intended to influence action which is not solely in the interest of the Company, the person or the organisation they represent.

This Policy is not meant to prohibit the following practices providing they are customary in a particular market, are proportionate and are properly recorded:

- Normal and appropriate hospitality;
- The giving of a ceremonial gift on a festival or at another special time;
- The offer of resources to assist the person or body to make a decision more efficiently, provided they are supplied for that purpose only.

Inevitably, decisions as to what is acceptable may not always be easy. If anyone is in doubt as to whether a potential act constitutes bribery, the matter should be referred to the Managing Director before proceeding.

Any employee in breach of this Policy will be subject to the Company's disciplinary Procedure and, subject to the severity of the breach, may be reported to the relevant Authorities for further action.

Employees responsibility

All employees have personal responsibility for the application of this Policy. It should be read and be familiarised with as part of each employee's induction and this Policy must be properly observed and fully complied with by all associated workers. Dedicated training is provided by the Company to ensure full understanding of the Bribery Act which should be conducted annually by all workers.

All employees throughout the Company are responsible for the prevention, detection and reporting of bribery. Employees or others can report confidentially, any suspicion of bribery by emailing the Managing Director at afield@afeco.co.uk.

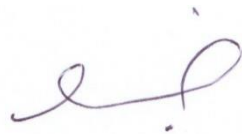
Review

This Policy applies to EcoGenR8 Limited and its trading divisions, AFECO and Innov8 Products. It is reviewed for each financial year.

This Policy relates to the 2020 / 2021 financial year.

I take full responsibility for ensuring the Policy is implemented.

Approved by A. Field
Director
November 2020

A handwritten signature in purple ink, appearing to be "A. Field".