



## HELICAL PLC

### Anti-Bribery and Corruption Policy

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Helical plc (the “Company”), including its subsidiaries (together the “Group”), endeavours to conduct its business in an honest and ethical manner. The Group adopts a zero tolerance approach to bribery and corruption and is committed to carrying out all business dealings and transactions fairly, openly and with integrity. This policy applies to, and must be complied with by all directors, employees and third parties associated with the Group (including those who provide goods or services for or on behalf of the Group). The principles outlined in this policy are bolstered by the Group’s Supplier Code of Conduct.

The Group acts to uphold and develop our reputation for doing business competitively and fairly, enhancing stakeholder confidence in the business, through our culture of zero tolerance of bribery and corruption.

#### Prohibited Behaviours

In accordance with this policy, the following behaviour is not acceptable and will not be tolerated:

1. giving, promising to give, or offering, a payment, gift or hospitality with the expectation or hope that a business advantage will be received, or to reward a business advantage already given;
2. giving or accepting a gift or hospitality during any commercial negotiations or tender process, if this could be perceived as intended, or likely, to influence the outcome;
3. accepting a payment, gift or hospitality from a third party that you know, or suspect, is offered with the expectation that it will provide a business advantage for them or anyone else in return;
4. accepting hospitality from a third party that is unduly lavish or extravagant under the circumstances;
5. offering or accepting a gift to or from government officials or representatives, or politicians or political parties, without the prior approval of the Company Secretary (or if the Company Secretary, without the prior approval of the Chief Executive or Finance Director);
6. threatening or retaliating against an individual who has refused to commit a bribery offence or has raised concerns in accordance with this policy; and
7. engaging in any other activity that might lead to a breach of this policy.

#### Facilitation Payments and Kickbacks

The Group does not make, and will not accept, facilitation payments (also known as “grease payments”) or kickbacks of any kind. In accordance with this policy, our agents and other intermediaries, joint ventures, contractors and suppliers must not make or accept facilitation payments or kickbacks for or on behalf of the Group.

**Facilitation payments** are unofficial payments made to public officials in order to secure or speed up routine actions, such as issuing permits, immigration controls, providing services or releasing goods held in customs.

**Kickbacks** are typically payments made in return for a business favour or advantage.

This policy is supported by our anti-bribery and corruption procedures which are designed to mitigate associated risks within the Group. This policy is also supported by our Whistleblowing Policy which encourages staff to raise legitimate concerns of suspected wrongdoing or dangers in relation to the Group's activities.

### Policy Ownership/Responsibility

The Board has overall responsibility for ensuring that this policy complies with our legal and ethical obligations, and that all those under the Group's control comply with it.

The Company Secretary has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, and responding to any queries in relation to its contents.

Management at all levels are responsible for ensuring that those individuals reporting to them understand and comply with this policy.

In accordance with the s.172 Companies Act 2006 duty to promote the success of the Company, the Board places continuous emphasis on the importance of preventing and mitigating all potential risks associated with bribery and corruption and adopts the zero tolerance approach to such risks when decision making.

### Breaches of this Policy

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

Breaches of contractual provisions relating to the prevention of bribery and corruption are not tolerated by the Group and may amount to a material breach of contract. We require all third parties associated with the Group (including those who provide goods or services for and on behalf of the Group) to comply with this policy. We will avoid doing business with others who do not commit to doing business without bribery.

Last approved by the Board on 13 February 2020.