

Anti-Bribery and Corruption Policy

Acuiti Labs maintains a zero-tolerance approach to bribery and corruption. We are committed to conducting our business with integrity and in compliance with all anti-corruption laws, including the Foreign Corrupt Practices Act (FCPA), the UK Bribery Act, and other relevant regulations.

Country-specific addendums provide further information as necessary.

Key Principles:

- **Prohibition of Bribery:** Employees must not offer, give, receive, or solicit any form of bribe or improper payment to gain a business advantage.
- **Third Parties:** Ensure that all third parties acting on behalf of Acuiti Labs adhere to the company's anti-corruption policies. Conduct due diligence on suppliers, contractors, and business partners.
- **Gifts and Hospitality:** Accepting or offering gifts and hospitality must comply with company policy and not influence, or appear to influence, business decisions. All gifts and hospitality must be transparently reported.

Forms of Bribery and Corruption:

Bribery is offering, promising, giving or accepting any financial or other advantage, to induce the recipient or any other person to act improperly in the performance of their functions, or to reward them for acting improperly, or where the recipient would act improperly by accepting the advantage. Bribery is a criminal offence and is not acceptable. Examples are:

- **Bribes:** Inducements or rewards offered to gain commercial or personal advantage.
- **Kickbacks:** Payments made to secure or reward favorable treatment.
- **Facilitation Payments:** Small payments to expedite routine governmental actions.

Compliance and Training:

The prevention, detection and reporting of bribery and other forms of corruption are the responsibility of all those working for us or under our control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.

- **Training:** Employees must participate in regular training on anti-corruption laws and company policies.
- **Monitoring:** The company will monitor compliance and conduct audits to detect and prevent bribery and corruption.

Reporting Violations:

- **Reporting:** You must report any suspicions of bribery or corruption to the HR department or through the whistleblower hotline as soon as possible. For example, if a client or potential client offers you something to gain a business advantage with us, or indicates to you that a gift or payment is required to secure their business.
- **Investigation:** The company will investigate all reports and take appropriate action, including disciplinary measures and legal reporting if necessary.

Protection

We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken.

We are committed to ensuring no one suffers any detrimental treatment as a result of refusing to take part in bribery or corruption, or because of reporting in good faith their suspicion that an actual or potential bribery or other corruption offence has taken place, or may take place in the future. If you believe that you have suffered any such treatment, you should inform your line manager or the HR Department immediately. If the matter is not remedied, you should raise it formally using our Grievance Procedure.

Breaches

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

We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.