



Anti-bribery policy

This statement is made in accordance with the UK Bribery Act 2010 (the Act) and sets out the measures that Oxkem Ltd ("Oxkem") has taken to ensure compliance with the above Act.

A bribe is broadly defined by the Act as follows: giving or receiving a financial or other advantage in connection with the 'improper performance' of a position of trust, or of a function that is expected to be performed impartially or in good faith. Corruption may be defined as dishonest or fraudulent conduct which typically involves bribery.

It is Oxkem's policy to carry out all our work in an honest and ethical manner. The company is committed to acting professionally, fairly and with integrity in all its business dealings and activities, wherever it operates. We believe in maintaining the highest standards of transparency, and in conducting our business in a way that does not compromise the integrity of our workforce and operations. Accordingly, we take a zero-tolerance approach to bribery and corruption.

All our employees, contractors and partners are strictly forbidden from making, soliciting or receiving any bribes or unauthorised payments, as is anyone else acting for or on behalf of Oxkem. In the context of our anti-bribery measures and in accordance with the Act, the Company considers that gestures of hospitality and goodwill, whether given or received by Oxkem, are acceptable, provided they are made transparently and are proportionate, reasonable and appropriate. Similar stipulations apply to the allocation of promotional expenditure.

All employees of Oxkem have read and understand the information in this policy and are required to comply with it. Any breach of this policy by an employee will be treated as grounds for disciplinary action, which could lead to dismissal from Oxkem for gross misconduct. Employees and other individuals acting for the Company understand that bribery is a criminal offence which might result in imprisonment and/or unlimited fines for the individual and for the Company.

All Oxkem's employees are encouraged to express any concerns that they might have with regard to actions undertaken by Oxkem, or by any company in its supply chain, to their line manager, the HR department or the managing director. This can be done in complete confidentiality.

Edward Head

A handwritten signature in blue ink, appearing to read "Edward Head", is written over a horizontal line.

Managing Director
Oxkem Ltd
1st January 2023