

## **MPS Group -Anti-Bribery Policy**

### **1. Introduction**

MPS Group is committed to conducting its business ethically, with integrity, and in compliance with all applicable laws and regulations, including anti-bribery laws. This policy outlines our commitment to preventing bribery in all its forms and provides guidance on how to recognise and avoid bribery-related risks.

### **2. Policy Statement**

MPS Group prohibits the offering, giving, solicitation, or acceptance of any bribe, whether cash or other inducement, to or from any person or company, regardless of their sector or nationality. We will not tolerate any form of bribery, whether direct or indirect, and expect all employees and associated persons to adhere to this policy.

### **3. Compliance with Anti-Bribery Laws**

We will comply with all applicable anti-bribery laws and regulations, including but not limited to the UK Bribery Act 2010 and the Foreign Corrupt Practices Act (FCPA) in the United States.

### **4. Prohibited Conduct**

The following activities are strictly prohibited:

Offering, giving, receiving, or soliciting bribes, kickbacks, or any other form of improper payment or inducement.

Providing or receiving inappropriate gifts, hospitality, or entertainment with the intent to improperly influence business decisions.

Engaging in any form of corrupt or unethical behaviour, including facilitation payments.

Using intermediaries, agents, or third parties to facilitate bribery or corrupt practices on behalf of the company.

### **5. Gifts, Hospitality, and Entertainment**

While it is acceptable to give and receive gifts, hospitality, and entertainment as part of legitimate business relationships, such activities must be reasonable, proportionate, and comply with company policies and procedures. Employees must obtain approval from their line manager before giving or accepting any gifts, hospitality, or entertainment exceeding predefined thresholds.

### **6. Due Diligence**

We will conduct due diligence on all third parties, including suppliers, agents, distributors, and business partners, to assess their integrity and compliance with anti-bribery laws and regulations. We will not engage with any third party that poses an unacceptable risk of involvement in bribery or corrupt practices.

### **7. Reporting Mechanisms**

Employees are encouraged to report any suspected or actual instances of bribery or corrupt behaviour to their line manager, the compliance officer, or through the company's

whistleblowing procedures. All reports will be treated confidentially and investigated promptly and impartially.

### **8. Training and Awareness**

We will provide regular training and awareness-raising activities for employees to ensure they understand their obligations under this policy and are equipped to recognise and prevent bribery-related risks.

### **9. Consequences of Non-Compliance**

Any employee found to have violated this policy will be subject to disciplinary action, up to and including termination of employment. Individuals or entities found to have engaged in bribery or corrupt practices on behalf of the company may face legal consequences, including fines, imprisonment, and damage to the company's reputation.

### **10. Review and Monitoring**

This policy will be regularly reviewed and updated as necessary to ensure its effectiveness and compliance with anti-bribery laws and regulations.

Signed:

Mike Short : MPS Group Director

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