

ANTI-CORRUPTION AND BRIBERY POLICY

E. Poole & Co. Ltd recognises that bribery and corruption distorts competition, hinders fair trade, and represents an unacceptable cost to the business. The company therefore has a clear policy on corruption and we support our employees to make decisions in line with our stated position. Our corporate conduct is based on our commitment to acting professionally, fairly and with integrity.

E. Poole does not tolerate or engage in bribery or any form of unethical inducement or payment. All employees are required to avoid any activities that might lead to, or suggest, a conflict of interest with the business of the company. Employees must declare all hospitality or gifts accepted or offered, with will be subject to managerial review.

E. Poole do not make direct or indirect contributions to political parties. We will uphold laws relevant to countering bribery and corruption in all the jurisdictions in which we operate.

E. Poole will communicate this policy to all employees, suppliers, customers and business partners.

E. Poole will review the implementation of this policy in respect of its suitability, adequacy and effectiveness and make improvements as appropriate.

E. Poole comply with the Bribery Act 2010.

E. Poole tries to ensure that a risk (and fraud) awareness culture exists in this organisation. Any investigative action required will be conducted without regard to any person's relationship to this organisation, position or length of service.

Fraud and Malpractice comprises both the use of deception to obtain an unjust or illegal financial benefit and intentional misrepresentations impacting one or more individuals among management, staff or third parties.

All staff have a duty to familiarise themselves with the types of irregularities that might be expected to occur within their areas of responsibility.

When any staff member suspects that a fraud has happened, they must inform their Manager immediately.

Signed: 
Tim Green – Managing Director

Dated: 20.02.2025