

Leviat

Anti-Bribery Policy



1. Introduction

Leviat is dedicated to upholding the highest standards of legal, ethical, and moral conduct, as set out in our Code of Business Conduct. This Anti-Bribery Policy (the "Policy") reinforces the principles set out in the Code of Business Conduct and is intended to ensure compliance with all

relevant laws on anti-bribery and corruption, including the UK Bribery Act and the US Foreign Corrupt Practices Act ("FCPA"), among others.

The policy is designed to help employees identify

potential risks, avoid prohibited behaviour, and seek timely guidance when needed, ensuring that both Leviat and its employees are protected from the legal and reputational consequences of bribery and corruption violations.

2. Statement of Policy

Leviat maintains a zero-tolerance stance toward bribery and corruption. All employees and those acting on Leviat's behalf are strictly prohibited from offering, paying, soliciting, facilitating, or accepting bribes. The organisation continually evaluates both external and internal bribery risks and implements policies and procedures to prevent bribery and corruption, including measures designed to ensure:

- Robust financial and commercial controls are maintained to mitigate the risk of corrupt payments, including the requirement to keep complete and accurate books and records.
- Appropriate training is provided to all relevant employees and key stakeholders, tailored to their roles, activities, and associated risk exposures.
- Successor liability risks are mitigated through comprehensive due diligence conducted prior to any acquisition or joint venture, and by ensuring that newly acquired business units are effectively integrated to comply with our policies and procedures. 'Successor liability' refers to situations in which a purchaser may be held accountable for the seller's existing liabilities.
- Our business partners are required to operate in full compliance with all applicable local and international anti-bribery and corruption laws. 'Business partners' refers to third parties authorised to act on Leviat's

behalf — such as those assisting in securing, preparing, or negotiating bids for new or renewed contracts — and includes, but is not limited to, exclusive sales agents, distributors, lobbyists, and both short- and long-term joint venture partners.

- This Policy is communicated to all relevant employees and business partners.
- All Leviat employees are obligated to report any suspected or actual incidents of bribery or corruption to their line manager or through the Leviat Hotline, which permits anonymous reporting and ensures protection against any form of retaliation. Leviat maintains a zero-tolerance stance toward retaliation and will not permit any adverse action against an employee who, in good faith, raises a concern or cooperates with an investigation.

Leviat has specific anti-bribery and corruption requirements including in the following risk areas (see the Leviat Anti-Bribery Guidelines for further details):

Gifts, Hospitality and Promotional Expenditure

Leviat prohibits the giving or acceptance of any gifts or hospitality where such conduct could influence, or reasonably be perceived as influencing, the outcome of a business decision.

Political Contributions

Leviat and its employees must comply with local laws governing political contributions, which include contributions to or through political parties, organisations or individuals involved in political activity. However, as part of our Anti-Bribery and Corruption commitments, Leviat applies standards that exceed legal requirements in certain jurisdictions to itself and its employees. Even in those situations where political contributions are legally permissible, they must never be made, directly or indirectly, with the intention of obtaining, or appearing to obtain, an improper business advantage.

Charitable and Community Donations

Donations must only be made for bona fide charitable or public relations reasons. Donations must not be made in circumstances where an actual or potential conflict of interest exists or could reasonably be perceived to exist. Refer to "Charitable Donations and Community Engagement Policy" for further details.

Business Partners

Due Diligence must be undertaken to ensure our business partners share our commitment to ethical business standards. Written arrangements containing anti-bribery

provisions must be put in place, and compensation must be commensurate with the legitimate services provided, approved, properly recorded and paid in accordance with the contract. Due diligence is important when using third parties as Leviat may, in certain circumstances, still be liable for corruption carried out by a third party.

Facilitation Payments

These are generally small, unofficial payments made to public officials to expedite or secure routine governmental actions (for example, issuing permits or processing customs clearance). Leviat strictly prohibits the making of facilitation payments, regardless of whether

such payments may be permitted under local law.

Suppliers

The Leviat Supplier Code of Conduct sets out Leviat's ethical standards for its suppliers, including compliance with antibribery and corruption laws.

3. Roles and Responsibilities

Employees must:

- Read and understand their obligations under this Policy;
- Participate in any relevant training programme provided.
- If unsure, seek advice in relation to any aspect of this Policy from their manager, their local legal or compliance contact, or, if they prefer, from Leviat Head of Risk, Internal Controls and Compliance.
- Report suspected or actual instances of bribery or corruption, either to their manager or, if they feel more comfortable, via the Leviat Hotline, a multilingual and independent service through which the employee can communicate concerns in his or her own language with the option to remain anonymous

and without fear of retaliation.

- No employee will suffer adverse consequences for refusing to pay bribes or refusing to participate in other corrupt practices, even if this means a loss of business.

Company management must:

- Demonstrate clear leadership commitment and foster an anti-bribery culture throughout their organisation.
- Support communication of this Policy to employees and ensure employee participation in related training programmes.
- Adhere to this Policy in all dealings with customers, suppliers, and business partners.

- Implement and ensure the operational effectiveness of adequate controls and procedures to prevent and detect instances of bribery, including the maintenance of accurate, appropriately detailed books and records to properly record and report the substance of all transaction and disposition of assets;
- Ensure that appropriate and regular training is provided to relevant employees;
- Participate in any anti-bribery risk assessments; with antibribery and corruption laws.
- Ensure Leviat Hotline information is displayed prominently via posters and other means, and is available to all employees;
- Ensure immediate reporting of any breach or suspected breach to Legal and Compliance.

4. Monitoring, Assurance and Breach Reporting

Monitoring

Compliance with this Policy will be monitored as part of routine activities undertaken by the Leviat Head of Risk, Internal Controls and Compliance, and any issues identified will be reported to the appropriate stakeholders.

Compliance with the Policy may form the subject of review by Leviat Board of Management. Leviat may also review employees' activities, including company e-mails, to ensure compliance with this Policy.

Reporting

Any employee who violates the law or fails to determine in advance whether their conduct is appropriate acts solely on their own behalf and

without Leviat's authority. Such misconduct may expose Leviat to significant civil and criminal consequences,

including fines, debarment, damages, third-party legal actions, and reputational harm.

Failure to comply with this Policy, either intentionally or through negligence, may result in disciplinary procedures being fully enforced, including termination of employment and/or relevant contracts.

5. Relevant Contact Details

In the event of any questions with regards to the content, context or meaning of this document please contact your local compliance contact, or the Head of Risk, Internal Controls and Compliance.

Responsibility	Name	Email	Direct Dial
Head of Risk, Internal Controls and Compliance	Victoria Roberts	victoria.roberts@leviat.com	+353 87 928 37 65

6. Supplementary Documentation

- [Anti-Bribery Guidelines](#)

Leviat

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