



Anti-Bribery and Corruption (ABC) Policy

1. Introduction and Purpose

Element 25 Limited (**Company**) is committed to maintaining a high standard of integrity and to operating fairly, honestly, and legally in order to ensure that we comply with international regulations with regards to anti-corruption and bribery issues. We also make full commitment to ensuring the Company has an open and transparent management approach in order to avoid exposing ourselves to potential conflicts of interest.

The Company is committed to maintaining a high standard of ethical conduct in all business dealings. The Company does not obtain or retain business through any unethical or illegal means, and all contract and transaction related payments, including those in connection with gifts and other expenditures, are declared with reasonable details. The Company has developed this policy to prohibit inappropriate conduct associated with bribery and corruption.

2. Responsibility for Compliance

All directors, officers, employees (collectively, **Personnel**), joint venture partners, secondees, agents, consultants, contractors (where under a relevant contractual obligation) and representatives of the Company or its subsidiaries (the latter six collectively referred to in this Policy as **Contracted Third Parties**) are personally responsible for complying with this ABC Policy and all applicable laws and regulations worldwide. Personnel must also take reasonable steps to ensure that Contracted Third Parties comply with the ABC Policy. Any conflict between the ABC Policy and the law is to be referred to the relevant person to deal with this policy, Compliance Officer.

3. What is Bribery and Corruption?

Bribery is a form of corruption that involves providing, causing, offering, accepting, receiving, soliciting, promising or asking for a benefit to influence a person in order to gain an advantage which is not legitimately due. It does not matter whether the bribe is accepted, as the act of offering a bribe is usually enough to commit an offence. Corruption involves an abuse of power for personal gain or advantage for an entity (together **Improper Acts**).

4. Prohibition on Improper Acts and Other Unfair Dealings

This Policy prohibits Personnel and Contracted Third Parties from conducting any Improper Acts anywhere in the world (in both the private and public sector and irrespective of whether such Improper Act is on a direct or indirect basis). Personnel and Contracted Third Parties may also be personally liable and exposed to criminal and civil liability if they engage in any Improper Acts.

Personnel and Contracted Third Parties will make a clear distinction between the interests of the Company and private interests, and will avoid conduct that would expose Personnel and / or Contracted Third Parties to possible conflicts of interest. Personnel and Contracted Third Parties will not misuse privileged information, misrepresent information or conduct other unfair acts.

5. Retention of Records

The Committee shall retain all records relating to any Concern or report of a retaliatory act and to the investigation of any such report for a period judged to be appropriate based upon the merits of the submission. The types of records to be retained by the Committee shall include records of all steps taken in connection with the investigation and the results of any such investigation.

6. Queries

Any employee with a question about how this Policy should be followed, in a particular case, should contact their supervisor or any member of the Committee.

Justin Brown
Managing Director



Date: 17/03/2021