

ANTI BRIBERY POLICY

Metalex is committed to fair, honest and open business practices and has a zero-tolerance policy towards bribery. Everyone is responsible for the prevention, detection and reporting of bribery and any suspicion of bribery must be reported to General Manager or equivalent.

Any form of inducement such as offering or receiving a bribe that results in personal gain or advantage to the individual or another party or organisation, or that is intended to influence, is prohibited. This includes the bribing or attempted bribery of a foreign public official, with the intention of obtaining or retaining business.

The purpose of this Policy is to serve as a guide for all staff. It explains the steps needed to be followed in order to ensure the Company maintains its values, adheres to corporate responsibility, social and legal expectations. This Policy applies to all members of staff, regardless of seniority.

Metalex employees must not, directly or indirectly: -

- ❖ Offer, give, solicit or accept any bribe, either in cash or as any form of inducement, to or from any person or company, wherever they are located and whether they are a public official or private person or company.
- ❖ Gain any commercial, contractual or regulatory advantage for the Company in a way that may be deemed unethical.

Gifts and hospitality can, when excessive, constitute a bribe and/or conflict of interest. The value of the gifts and hospitality should not be unusually high or generous when compared to prevailing practices in our Industry. They should be generally avoided at the time when contracts are being tendered and awarded. All gifts and hospitality must be recorded for this purpose.

GIFTS

- ❖ Except for low value gifts that are mere tokens (such as promotional pens, calendars and stationery), employees are not permitted to accept any gifts from customers, suppliers or third parties involved in the Company.
- ❖ If refusing a gift could cause offence or embarrassment, the gift may be accepted and donated to a charity of the Company's choice.
- ❖ Approval must be sought from the General Manager or equivalent before accepting any gift.
- ❖ Cash should not be given or received as a gift under any circumstances.

HOSPITALITY

Corporate hospitality is defined as any form of accommodation, entertainment or other hospitality provided for an employee solely due to their position as a representative of the Company. The following are not considered corporate hospitality and don't require any approval: -

- ❖ Normal working lunches or refreshments provided during a business visit.
- ❖ Hospitality provided at a company approved seminar or industry event such as metal association annual dinners, golf days, as long as the hospitality is offered to all attendees.
- ❖ Free seminars, talks or workshops, provided they are free to all those attending.

All other forms of corporate hospitality require approval from the General Manager or equivalent before acceptance. If there is any doubt about the appropriateness of the gift or hospitality, the matter must be referred to the General Manager or equivalent.

Metalex will investigate seriously any actual or suspected breach of this Policy or the spirit of this Policy. Employees may be subject to disciplinary action which may ultimately result in dismissal. In the case of the third parties found to be bribing or attempting to bribe our employees, a senior officer, a supplier or customer, they will be informed in writing that business dealings will be ceased and appropriate authorities informed.