

Anti-Bribery Policy

It is SECOM's policy to conduct all business in an honest and ethical manner. We operate a zero-tolerance approach to bribery and corruption and are committed to acting professionally, fairly and with integrity in all our dealings wherever we operate.

This Policy considers the principles of the legal requirements outlined within the Anti-Bribery & Corruption Act 2010.

SECOM staff should attach importance to the pride and honour of being on the frontier pursuing the realization of a society. SECOM envisions, and strives to solidify the trust earned from society. For this purpose, our staff are informed not to succumb to temptations including bribes that superficially seem like kindness. Staff are also instructed to resist any temptations that disrupt their duty – no matter how trivial such temptations may be. The SECOM philosophy is not to give and not to receive and gift/advantage that may be seen to be a bribe. Any such offer/inducement is referred to the immediate Line Manager.

What is a bribe?

A bribe is a financial or other advantage offered or given;

- to anyone to persuade them, to or reward them, for performing their duties improperly or;
- to any public official with the intention of or influencing the official in the performance of their duties.
- it does not matter whether the advantage is given or accepted directly or through a third party.

Who is covered by the policy?

This policy applies to all individuals working at all levels and grades. Special rules apply to Sales representatives who will always maintain sound and transparent relations with public offices and other quasi-public organizations and entities as well as political groups and should refrain from performing any act that may be misunderstood as bribery.

Gifts and Hospitality

This policy does not prohibit giving and receiving promotional gifts of low value and normal and appropriate hospitality. However, in certain circumstances gifts and hospitality may amount to bribery and all employees must comply strictly with SECOM's ethics policy in respect of gifts and hospitality. We will not provide gifts or hospitality with the intention of persuading anyone to act improperly or to influence a public official in the performance of his duties.

Donations

We do not make contributions of any kind to political parties. No charitable donations will be made for the purpose of gaining any commercial advantage.

Raising Concerns

Employees will be encouraged to raise concerns about any issue or suspicion of malpractice. No employee will suffer when raising a bribery incident, even if they turn out to be mistaken.

In the rare event that internal disclosure proves inappropriate, concerns can be raised with the Police. With serious cases of bribery referral to the police involvement will be likely. Human Resources and line managers will be involved, as necessary. Any referral to the Police will not prohibit action being taken under Secom Plc's disciplinary procedures.

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Monitoring

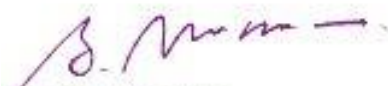
The effectiveness of this policy will be regularly reviewed and at least annually by the Board. Internal control systems and procedures will be subject to audit under the internal audit process.

Associated Policies

- PO036 - SECOM Anti Fraud and Corruption Policy
- PO040 - SECOM Risk Management Strategy
- PO044 - SECOM Supplier Management Policy

Document Review

Formal review of this Policy will occur once a year unless deemed necessary by changes in legislation and / or need due to improved practices.



Satoru Awano

Managing Director - SECOM PLC. Revised May 2023

Version No	Amendments	By Whom	Date
3	Regulatory Change	V Horlock	Jan 2020
4	Update with New MD Signature	D Jones	May 2023

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