

# Anti-Bribery and Corruption Policy Statement

## Introduction

**Bribery** is the offering, promising, giving, solicitation or the receipt or agreement to receive any financial or other advantage, or any other inducement from any person or Company by an individual employee or other person or body acting on another's behalf.

**Corruption** is the abuse of entrusted power for a private gain.

## Policy

This policy sets out OCU Modus Limited's policy in relation to bribery & corruption and confirms my commitment to compliance with my legal obligations under the Bribery Act 2010.

OCU Modus Limited values its reputation for ethical behaviour and for financial probity and reliability. It recognises that over and above the commission of any crime, any involvement in bribery will also reflect adversely on its image and reputation. Its aim therefore is to limit its exposure to bribery & corruption by:

- Setting out a clear Anti-Bribery & Corruption policy;
- Encouraging its employees to be vigilant and to report any suspicion of bribery or corruption, providing them with suitable channels of communication and ensuring sensitive information is treated appropriately;
- Rigorously investigating instances of alleged bribery or corruption and assisting the police and other appropriate authorities in any resultant prosecution; and
- Taking firm and vigorous action against any individual(s) involved in bribery and shall be treated as gross misconduct.

OCU Modus Limited believes in carrying out business fairly, absolutely forbids corruption and the paying or receipt of bribes for any purpose and expects all employees and contractors to adopt a high standard of business ethics.

OCU Modus Limited prohibits Bribery of or by any person in order to:

- Gain any commercial, contractual or regulatory advantage for the Company in a way which is unethical; or
- Gain any personal advantage, pecuniary or otherwise, for the individual or anyone connected with the individual.

When acting for the Company, only charitable contributions are allowed within agreed Company guidelines.

This policy is not meant to prohibit hospitality providing they are properly recorded.

The prevention, detection and reporting of bribery or corruption is the responsibility of all persons within or associated with the OCU Modus Limited. Reports can be made confidentially on 0203 1792 250 or sent in writing to:

John Cahill  
OCU Modus Limited  
Hiltons Wharf  
Greenwich, London  
SE10 9QX

All personnel must understand the requirements of this anti-bribery and corruption policy and abide with the contents.

Any incident of bribery or corruption will be reported to the Police.

Disciplinary action will be taken against any employee who is directly, or indirectly, involved in bribery or corruption.

This policy will be reviewed annually by the Senior Management Team and is available to the public and interested parties on request.

A handwritten signature in black ink, appearing to read 'J. Cahill'.

John Cahill

Managing Director

OCU Modus Ltd

Reviewed and updated: 3<sup>rd</sup> April 2023

Next review: January 2024