



# ANTI-BRIBERY & CORRUPTION POLICY

Aventus Energy Ltd is fully committed to ensuring the company, all employees and acting parties operate in a compliance with the Bribery Act 2010 and the Competition Act 1998.

## Introduction

Bribery for personal or commercial gain is a criminal offence. Aventus Energy have reviewed our current processes against the requirements of the applicable legislation and prohibits any form of bribery of counterparties for personal or commercial advantage.

We require compliance, from everyone connected with our business, and monitor the acts of all personnel including those with positions of dominance in our company, to ensure that we comply with the highest ethical standards and laws applicable. Integrity and transparency are of utmost importance to us, and we have a zero-tolerance attitude towards corrupt activities of any kind, anti-competitive agreements, cartel activities, or abuse of a dominant position whether committed by employees or by third parties acting for or on behalf of the Company.

## Policy

It is prohibited, directly or indirectly, for any employee or person working on our behalf to:

- Offer, give, request, or accept any bribe i.e., gift, loan, payment, reward or advantage, either in cash or any other form of inducement, to or from any person.
- Act in involvement with cartel activities or are party to potentially anti-competitive agreements.
- Use their position of power to exert dominance in an abusive manner.

In order to gain commercial, contractual or regulatory advantage for the Company, or in order to gain any personal advantage for an individual or anyone connected with the individual in a way that is unethical.

## Suspicion

If we suspect that you have committed an act of bribery or attempted bribery, an investigation will be carried out and, in line with our disciplinary procedure where appropriate, action may be taken against you which may result in your dismissal, or the cessation of our business arrangement with you.

## Reporting

If you, as an employee or person working on our behalf, suspect that an act of bribery or attempted bribery has taken place, or you have identified other anti-competitive acts that contravene the company's policy, even if you are not personally involved, you are expected to report this to a Director. You may be asked to give a written account of events.

Staff are reminded of the Aventus Energy Whistleblowing Policy which is available in the Employee Handbook.

## Gifts and Hospitality

We realise that the giving and receiving of gifts and hospitality as a reflection of friendship or appreciation where nothing is expected in return may occur, or even be commonplace, in our industry. This does not constitute bribery where it is proportionate and recorded properly.

No gift should be given, nor hospitality offered by an employee or anyone working on our behalf to any party in connection with our business without receiving prior written approval from a Director.

Similarly, no gift or offer of hospitality should be accepted by an employee or anyone working on our behalf without receiving prior written approval from a Director.

## Record Keeping

A record will be made by a Director of every instance in which gifts or hospitality are given or received.

Author:	HSQE/KF21	Anti-Bribery & Corruption Policy	Page 1 of 2
Rev 3.0	17/11/2022	Date Printed: 18/11/2022	Uncontrolled when printed



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As the law is constantly changing, this policy, and the company's processes are subject to regular review against the requirements of the Bribery Act 2010 and Competition Act 1998. The Company reserves the right to amend this policy without prior notice.

Personnel should report any concerns they may have about a colleague relating to such matters directly to one of the company Directors for attention.

A handwritten signature in black ink, appearing to read "Ross Thomson".

Ross Thomson  
Managing Director

Date: 17/11/2022

Author:	HSQE/KF21	Anti-Bribery & Corruption Policy	Page 2 of 2
Rev 3.0	17/11/2022	Date Printed: 18/11/2022	Uncontrolled when printed