

Anti-Corruption and Anti-Bribery Policy

Policy owner	General Manager, on behalf of the Reddion Board of Management
Applies to	Reddion and all its group entities and locations
Version	1.0
Effective date	2026-06-01
Next scheduled review	Effective date + 1 year, or earlier upon a material change in law, operations, or risk profile
Related documents	Reddion Code of Conduct, Reddion Supply Chain Code of Conduct, Safety and quality management system

1. Introduction and Policy Statement

Reddion conducts its business fairly, honestly, and with integrity, in every country and market in which we operate. Corruption and bribery undermine fair competition, damage the communities we work in, and expose Reddion and the people who work for it to serious legal, financial, and reputational harm. Reddion therefore applies a zero-tolerance approach to bribery and corruption, in any form, given or received, directly or indirectly.

This policy reflects our commitment as an organization and sets one consistent standard across all Reddion locations and entities.

This is not only a policy for compliance: every person working for or on behalf of Reddion is expected to understand it, apply it, and speak up when something looks wrong. Reddion's Board of Management and senior leadership endorse this policy and are committed to leading by example.

2. Purpose and Aim

This policy sets Reddion's minimum standards for complying with all applicable anti-bribery and anti-corruption laws and regulations. Where local law imposes a stricter standard than this policy, the local law prevails.

This policy forms part of Reddion's broader integrity and compliance program, alongside the Reddion Code of Conduct and our safety and quality management systems. It should be read together with those documents.

3. Who This Policy Applies To

This policy applies, without exception, to all Reddion employees, across all group entities and locations. It also applies to any third party acting for or on behalf of Reddion, including agents, consultants, contractors, subcontractors, suppliers, distributors, and joint-venture or business partners, wherever they are located.

4. Key Definitions

- **Bribery:** Any consideration of value that is offered, promised, or given with the intention of corrupting a person's behavior, in order to gain an improper advantage or influence business conduct. This can include cash or cash equivalents, excessive hospitality, gifts, travel, entertainment, offers of employment, preferential treatment, and certain donations or contributions.
- **Corruption:** The misuse of entrusted power or position for private gain, typically involving an act of bribery.
- **Improper advantage:** Obtaining something to which Reddion is not legally or legitimately entitled, such as improper access to a bid or tender, evasion of tax or penalties, or avoidance of enforcement action or litigation.

- **Public official:** Any person holding a legislative, administrative, or judicial office, or otherwise acting on behalf of a government, state-owned entity, public international organization, or political party – whether appointed or elected, paid or unpaid – including candidates for such office.
- **Facilitation payment:** Small, usually undocumented payments made to a low-level public official to induce them to perform a routine duty they are already obliged to perform. Facilitation payments are prohibited under this policy.
- **Business partner / third party:** Any organization or individual acting for or on behalf of Reddion, or with whom Reddion does business, including agents, consultants, suppliers, contractors, and joint-venture partners.
- **Conflict of interest:** A situation in which an employee's personal interests – financial, family, or otherwise – could improperly influence, or appear to influence, their judgement or decisions on behalf of Reddion.

If you are ever in doubt about how these definitions apply to a situation you are facing, contact your manager or the general manager before you act.

5. Our principles

5.1 No bribery, public or private

You must never offer, promise, give, request, or accept a bribe, directly or through any other person, to or from a public official or a business partner, in order to obtain or retain business or any other improper advantage. This applies equally to bribery of public officials and bribery in purely commercial (private-to-private) relationships.

5.2 Facilitation payments

Reddion prohibits facilitation payments of any kind. If you are asked to make one, or you believe you are likely to be asked, do not make the payment. Report the situation to your manager or the general manager immediately so that an appropriate response can be agreed, and document what was requested and by whom.

5.3 Gifts, hospitality, and entertainment

Modest gifts, hospitality, and entertainment, given or received in the normal and reasonable course of business, are not prohibited. They must never be cash or a cash equivalent, must be proportionate and infrequent, must never be offered or accepted in connection with a pending decision, tender, or approval, and must never create even the appearance of an improper attempt to influence business conduct.

- Gifts, hospitality, or entertainment above the value set out in Reddion's internal guidance must be pre-approved by your manager and recorded in the Gifts, Hospitality and Donations Register.
- Gifts or hospitality offered to, or received from, a public official requires prior approval from the general manager, given the heightened legal risk involved.

5.4 Charitable donations, sponsorships, and political contributions

Charitable donations and sponsorships must never be offered, or reasonably appear to be offered, in order to influence a tender, contract award, or other business decision in Reddion's favor. Any donation or sponsorship must comply with applicable law and must be approved in advance by the general manager. Reddion does not make contributions to political parties, candidates, or campaigns in its own name.

5.5 Cash payments

Cash payments to third parties should be avoided wherever possible. Where a cash payment is genuinely necessary for a legitimate business reason, it must be pre-approved and the business reason documented in Reddion's financial records.

5.6 Conflicts of interest

You must disclose to your manager or the general manager any personal, family, or financial interest that could reasonably be seen to influence a business decision you are involved in, including relationships with

public officials, suppliers, or customers. Undisclosed conflicts of interest can create the same risks as bribery.

6. Third Parties, Business Partners, and Due Diligence

Reddion is responsible for the conduct of the third parties who act on its behalf, and only works with reputable, ethical business partners. Before entering into a new relationship with a third party who is expected to interact with public officials, or otherwise act for Reddion, the following applies:

- A risk-based due diligence process must be completed on the third party, proportionate to the corruption risk of their role, sector, and location.
- The general manager must confirm that engaging the third party is acceptable and consistent with this policy before the relationship begins.
- Contracts with higher-risk third parties should include anti-bribery undertakings and, where appropriate, audit and termination rights.
- Due diligence should be refreshed periodically for ongoing relationships, particularly where risk indicators change.

7. Suppliers and the Supply Chain

The principles of this policy are reflected in Reddion Supply Chain Code of Conduct, which forms part of the contractual relationship between Reddion and its suppliers. Procurement and business owners are responsible for ensuring key suppliers have acknowledged this Code.

8. Books, Records, and Internal Controls

All transactions carried out for or on behalf of Reddion must be fully documented and accurately recorded in Reddion's books and records. Off-the-books accounts or payments are strictly prohibited, as are false, misleading, incomplete, or artificial entries of any kind. Finance and internal control processes should be designed to detect unusual or unexplained payments.

9. Roles and Responsibilities

- **All employees:** Every person to whom this policy applies is individually responsible for complying with it and for acting with integrity in their day-to-day work.
- **Managers:** Managers are responsible for reviewing and critically assessing any payment, gift, or third-party engagement they authorize, particularly where it touches on conduct restricted by this policy, and for setting a visible example to their teams.
- **Compliance Officer:** Responsible for interpreting this policy, approving higher-risk gifts, donations, and third-party relationships, maintaining the relevant registers, overseeing investigations into reported concerns, and reporting periodically to the Board of Management on the operation of this policy.
- **Board of Management / General Manager:** Responsible for tone from the top, approving higher-risk gifts, donations, and third-party relationships, maintaining the relevant registers, overseeing investigations into reported concerns, and understanding and periodic review on the operation of this policy.

10. Risk Assessment, Training, and Awareness

Reddion will periodically assess its exposure to bribery and corruption risk, taking into account the countries, sectors, and types of third party it deals with, and will update this policy and its controls where that assessment identifies a need to do so.

Employees in roles with exposure to bribery and corruption risk, including sales, procurement, and management roles, will receive training on this policy on joining Reddion and periodically thereafter. This policy and related guidance will be made available in the languages relevant to Reddion's workforce.

11. Recognizing “Red Flags”

Certain situations carry a higher risk of bribery or corruption and call for extra care. Examples include, but are not limited to:

- A third-party requests payment in cash, to an unrelated party, or to an account in a different country from where the services are provided.
- A third party requests an unusually high commission or resists standard anti-bribery contract terms or audit rights.
- A business partner has a close personal or family relationship with a public official involved in a relevant decision.
- A request for a donation, sponsorship, or gift arrives shortly before or after a tender, permit, or contract decision.
- Requests to make payments through unusual channels, or to keep a transaction “off the books” or undocumented.

If you notice one or more of these indicators, or anything else that does not feel right, raise them with your manager or the general manager before proceeding.

12. Speak Up – Reporting Concerns

If you have a question about this policy, or you suspect that someone acting for or on behalf of Reddion may have breached it, please say so. You can raise concern with your manager, Reddion confidential trusted persons channel, the general manager, or, if you prefer to remain anonymous, through Reddion Speak Up channel.

Every report will be taken seriously, handled confidentially, and investigated appropriately. Reddion guarantees that anyone who raises a concern honestly and in good faith will be protected from any form of retaliation, disadvantage, or negative consequence as a result of speaking up, even if the concern turns out, after investigation, to be unfounded.

13. Non-Compliance and Enforcement

Reddion strictly enforces this policy. Bribery is a criminal offence in most jurisdictions in which we operate, and corrupt conduct exposes both Reddion and the individuals involved to the risk of prosecution, fines, and imprisonment, as well as serious damage to Reddion's reputation.

Any breach of this policy will lead to appropriate disciplinary action, up to and including dismissal, and may result in legal sanctions and, where warranted, referral to law enforcement authorities.

14. Policy Governance and Review

This policy is owned by the general manager on behalf of Reddion Board of Management. It will be reviewed at least annually, and earlier where changes in law, our operations, or our risk profile make that necessary. Questions about the interpretation or application of this policy should be directed to the general manager.