



## **Anti-Bribery and Corruption Policy**

Stephen Austin is committed to the highest standards of ethical conduct and integrity in all of its business activities, wherever they may take place globally.

To this end, the company:

- Prohibits bribery and corruption in all its forms and in all activities, that prohibition applying to all; including employees, others acting for or on behalf of the company and business associates, whether under the control of the company or not;
- Commits to implementing measures to prevent bribery and corruption;
- Commits to detecting, reporting and dealing with any bribery which does occur;
- Shall comply with all applicable anti-bribery law, including the Bribery Act 2010.

In support of this Anti-Bribery and Corruption policy, Stephen Austin has implemented and will maintain an Anti-Bribery Management system (ABMS), in compliance with the ISO37001:2016 standard. The ABMS provides a framework for setting anti-bribery objectives, which will be reviewed at planned intervals. The ABMS will be managed by an independent compliance function within the business, reporting directly into the senior management team. The top management of the company commits its full support to this policy, the Anti- Bribery Management system and its associated policies and procedures.

This policy shall be communicated within our company, but also externally to all relevant stakeholders and on our company website. Employees and stakeholders are duly made aware of the consequences of failing to comply with the ABMS. The policy and associated ABMS will be reviewed at planned intervals by top management for its continued suitability.

David Cockram  
Managing Director