

## 1 DIRECTORS STATEMENT

Luce Bay Group are committed to a 'zero tolerance' approach to the making or receiving of bribes and other corrupt practices. Our Directors will seek to foster a culture within the company that bribery is unacceptable. We shall implement our policies and procedures and will make clear to employees and others acting on behalf of Luce Bay Group that acts of bribery are unacceptable. Luce Bay Group's directors will encourage the reporting of such corrupt acts and support individuals who make a report in good faith and will seek to comply with the Bribery Act 2010 and the relevant guidance.

## 2 ANTI-BRIBERY AND CORRUPTION POLICY STATEMENT

Luce Bay Group strive to attain the highest ethical and professional standards of business practice. All employees and those acting for or on behalf of Luce Bay Group are responsible for conducting themselves honestly and professionally.

The directors do not tolerate any form of bribery by its employees or any person associated with or acting on behalf of Luce Bay Group. The directors are committed to implementing and enforcing effective systems to prevent, monitor and eliminate bribery in accordance with the provisions in the Bribery Act 2010. The directors have established a policy and supporting procedures to prevent and prohibit bribery. This policy will apply to all employees and those acting for and on behalf of Luce Bay Group, they are required to familiarise themselves and to comply with the policy.

Bribery is a criminal offence which may result in a prison sentence or unlimited fines for those involved. A breach of Luce Bay Group's anti-bribery policy will be treated as grounds for disciplinary action and could depending on the nature of the breach result in an employee's dismissal or the termination of an agent's, consultant's or business partner's appointment.

The success of Luce Bay's anti-bribery policy depends on the detection and eradication of acts of bribery. All employees and those associated with Luce Bay Group have a role to play in achieving this goal. Therefore all employees are encouraged to report suspicious activities to the company's directors. The Directors will support any individual who reports such activities in good faith.

### 3 ANTI-BRIBERY POLICY AND PROCEDURES

- 3.1 Luce Bay Group are committed to complying with the Bribery Act 2010 and the relevant guidelines and to require those agents, consultants, and business partners who work on LUCE BAY LTD 's behalf to comply with the same laws and practices.
- 3.2 Luce Bay Group expect our employees, agents, consultants and business partners to act with honesty, integrity and fairness in all aspects of their business activities and exercise as a minimum the standards of professionalism and ethical conduct required by the Bribery Act 2010
- 3.3 Bribery is a criminal offence. A bribe can be broadly defined as a financial or other advantage to encourage a person to perform their function or activity improperly or to reward someone for having performed their function or activity improperly.

### 4 THE POLICY

- 4.1 Luce Bay Group **prohibit** bribery or other acts of corruption in any form.
- 4.2 This Policy applies to all staff (i.e. Directors, Management and employees, agents, consultants, and business partners.)

### 5 TOP LEVEL COMMITMENT

The Directors are committed to the above Policy i.e. a *'zero tolerance'* approach to the making or receiving of bribes or corrupt practices. The Directors will seek to foster a culture within Luce Bay Group that bribery is unacceptable and encourage the reporting of such corrupt acts. In addition we will review and update the policy, if necessary, a minimum of once every 12 months.

### 6 PREVENTION AND REPORTING

The prevention, detection, and reporting of bribery is the responsibility of everyone at Luce Bay Group. Employees can report confidentially in accordance with the procedures within the Company Handbook.

### 7 FAILURE TO COMPLY WITH THE POLICY

A breach of the policy will result in disciplinary procedures in accordance with the Staff Handbook. The outcome of which will depend on whether the breach is classed as Misconduct or Gross Misconduct.

### 8 GIFTS AND CORPORATE HOSPITALITY

It is not the intention of this policy to prohibit normal and appropriate gifts or corporate hospitality.

## 9 COMMUNICATION

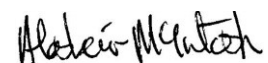
Luce Bay Group seek to ensure that our bribery policy and procedures are embedded and understood throughout the company by means of internal and external communications including training. This is done in a manner which is proportionate to the risks faced.

## 10 RISK ASSESSMENT

The nature and extent of Luce Bay Group's exposure to potential risks both internal and external to the company are periodically assessed on a proportionate basis



Adam McIntosh  
Company Director  
01 December 2022



Alastair McIntosh  
Company Director  
01 December 2022