

### PSMG LIMITED ANTI-BRIBERY AND CORRUPTION POLICY

PSMG is determined to maintain its status as a reputable company, which will not tolerate bribery, corruption or abuse of position for personal gain. This policy statement sets out the main principles for countering bribery and corruption.

All employees, and those associated with PSMG play a key role in the prevention of bribery and corruption. Our management team provides a framework within which counter-bribery arrangements flourish, and promotes a fair and honest culture across the whole of the company.

The Bribery Act 2010 defines bribery as the giving or taking of a reward in return for acting dishonestly and/or in breach of the law. There are four different classifications of bribery:

1. Bribing another person;
2. Being bribed;
3. Bribing a foreign public official;
4. Failure to prevent bribery.

This policy statement applies to all employees (full time, part time, temporary and casual) and any others who work for or in association with PSMG.

Responsibility for an anti-bribery culture is the joint duty of all those involved in giving direction, determining policy and management. The strategy should be directed against bribery and corruption whether it is attempted against PSMG from outside or from within its own workforce.

PSMG expects that employees at all levels will lead by example in ensuring adherence to legal requirements, contracts procedure rules, financial procedure rules, codes of conduct and best (professional) practice. As part of this culture, the company will provide clear routes by which concerns can be raised by employees. Senior management is expected to deal swiftly and firmly with those who are exposed to bribery, or who are corrupt.

Although this document specifically refers to bribery and corruption, it equally applies to any forms of malpractice that can reduce confidence in PSMG and its activities and may also include acts committed outside of official duties but which impact upon the company's trust in the individual concerned.

Examples may include the criminal acts of "bribery or corruption", which includes all assets and cash; false accounting; obtaining by deception; pecuniary advantage by deception; computer abuse and computer crime. All employees can be exposed to a number of "pressures", from outside influences to act in a particular way in a particular case; this may involve "favouritism" regarding the access to all kinds of services and benefits.

Our business risk assessment must consider bribery and corruption risks resulting from market changes, changes in products, customer base or services, and new acquisitions or major contract wins, as well as advisors and other third-party service providers involved in the supply chain. Other areas to consider include our particular customers, geographical areas of operation, outsourced arrangements and the product/service type offered.

PSMG expressly prohibits any person employed by or associated with us from offering, promising or giving any financial or otherwise advantageous gift to another party. We have identified the following as areas of possible bribery:

1. Corporate hospitality with high value gifts.
2. Conflicts of Interest
3. Data protection and information security
4. Responsible use of social media
5. Market abuse

We therefore will

1. Plan to provide annual training for all identified high risk staff to enable them to understand and fulfil their obligations under the legislation of the area in which they operate and in line with local anti-bribery and corruption procedures.
2. Ensure that all necessary controls and communications are in place to forestall and prevent bribery and corruption, and that adequate monitoring procedures are in place.
3. Ensure appropriate due diligence is carried out and fully documented on third party individuals/ companies. This includes ensuring that all required vetting checks are completed.
4. Ensure appropriate measures are in place to ensure bribery and corruption risk is taken into account in the day-to-day operation of the business, including in relation to the development of new products and services, the taking on of new customers/suppliers and changes in the business's profile as a result of new contract wins or acquisitions.

Employees or those associated should normally raise concerns through their immediate manager, however it is recognised that they may feel inhibited in certain circumstances. In this case, employees should contact either the Business/Operational Director.

Jason Silcox



Business Director  
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