



Anti-Corruption and Bribery Policy

1. Purpose

1.1. It is our policy to conduct all of our business in an honest and ethical manner. We take a zero-tolerance approach to bribery and corruption and are committed to acting professionally, fairly and with integrity in all our business dealings and relationships.

1.2. Any employee who breaches this policy will face disciplinary action, which could result in dismissal for gross misconduct. Any non-employee who breaches this policy may have their contract terminated with immediate effect.

2. Who must comply with this policy?

2.1. This policy applies to all persons working for or on behalf of Impress in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners.

3. What is bribery?

3.1. “Bribery” means a financial or other inducement offered, promised or provided to gain any commercial, contractual, regulatory, personal or other advantage. Bribes can take the form of money, gifts, loans, fees, hospitality, services, discounts, the award of a contract or any other advantage or benefit. All forms of bribery are strictly prohibited. If you are unsure whether a particular act constitutes bribery, raise it with your manager. Specifically, you must not:

- give or offer any payment, gift, hospitality or other benefit in the expectation that a business advantage will be received in return or to reward any business received unless it is in line with the Gifts & Hospitality Policy that is part of the Impress Code of Conduct;
- accept any offer from a third party that you know or suspect is made with the expectation that we will provide a business advantage for them or anyone else.

3.2. Threats or retaliation against another person who has refused to offer or accept a bribe or has raised concerns about possible bribery or corruption will not be tolerated and will result in disciplinary proceedings.

4. How to raise a concern

4.1. If you are offered a bribe, or are asked to make one, or if you suspect that any bribery, corruption or other breach of this policy has occurred or may occur, you must notify your manager or report it in accordance with our Whistleblowing Policy as soon as possible.

4.2. All reports will be treated in confidence. However, if appropriate, concerns can be reported anonymously.

4.3. Impress will maintain a secure record of instances of suspected or actual bribery and review these annually, as part of its risk assessment.

We are committed to reviewing our policy and good practice annually.

Approved by: The Board of Impress

Date: 12 December 2023

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