



Anti-Bribery and Corruption Policy



This policy is non-contractual and may be subject to change from time to time.
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Change Control and Change History

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This policy has been adopted by Albacore Holdings Jersey Ltd on behalf of itself and all of its direct and indirect subsidiaries. References to “Apogee” or “Albacore” in this policy are intended to refer to Albacore Holdings Jersey Ltd and all of its direct and indirect subsidiaries.

Guiding Principles

At Apogee, our integrity is non-negotiable – we do not tolerate bribery of any kind – and we will not knowingly facilitate any other party’s corrupt conduct. We will never trade our integrity for a business opportunity. We believe it is important that public officials spend public money based on the merits of the deal, not for personal interests.

We do not bribe. You must not offer, promise, give or accept money or anything of value to or from any person to improperly obtain or retain business, secure an improper advantage, or otherwise influence them to act improperly.

We do not allow third parties to bribe on our behalf. You may not use third parties to take actions that we cannot otherwise take ourselves. You must not ignore “red flags” that indicate that a third party may make illegal payments or engage in corrupt behaviour on Apogee’s behalf.

We do not engage in activities that create the appearance of impropriety.

We maintain accurate books and records. You must fairly and accurately represent how we spend our money, no matter how large or small the transaction. You must comply with our Record Retention Policy.

We comply with local laws. This Policy sets a global, minimum standard and provides the underlying principles to help our employees and directors uphold Apogee’s anti-corruption commitment. However, many countries have more restrictive rules and you must comply with those requirements as well.

We observe a higher standard of conduct when dealing with public sector officials.

A public sector official may include:

- Any officer or employee of a public sector or any department, agency, or public international organization.
- Any person acting in an official capacity for, or on behalf of, any such public sector or any department, agency or public international organization.
- Members of royal families.
- Candidates for a political office.

This Policy establishes Apogee’s global anti-corruption principles and applies to Apogee employees worldwide. Apogee employees may not deviate from Apogee’s Anti-Corruption Policy or any of the related policies without prior written authorization from Apogee’s in-house counsel. Breaches of this Policy may lead to disciplinary action up to and including termination of employment with Apogee. Any employee with knowledge or suspicion of any breaches of this Policy must report these concerns to integrity@apogee.com. For scenarios and additional guidance on recognizing circumstances suggesting a risk of bribery, kickbacks or other improper conduct, visit the Anti-Corruption Red Flags Site.