



## Anti-Bribery and Corruption Policy

June 2024



## Anti-Bribery & Corruption Policy

### 1. Key Terms

**Affiliate:** is a company that is **not** a subsidiary of Apogee Corporation Limited but is **controlled by**, or under **common control** with, Apogee Corporation Limited.

**Amenities:** Refers to various supplementary benefits or facilities that are received, given, promised, offered, agreed upon or accepted.

**Bribe:** An inducement or reward offered, promised or provided to gain any commercial, contractual, regulatory or personal advantage as outlined in the Bribery Act 2010.

**Bribery:** is the act of offering, giving, receiving, or soliciting something of value as a means of influencing the actions of an individual holding a public or legal duty. Bribery is a form of corruption and is considered illegal and unethical in most jurisdictions around the world. It undermines the principles of fairness and meritocracy, as it allows people to gain advantages through illegitimate means as outlined in the Bribery Act 2010.

**Corruption:** Dishonest or fraudulent abuse of entrusted power for private gain. This unethical practice can manifest in various forms and can occur at any level within an organization, from junior employees to high-ranking executives and board members. Corruption can undermine the integrity of the business, distort market competition, and damage the reputation and legal standing of Apogee.

**Company:** Refers to **Apogee Corporation Limited and all of its subsidiaries and affiliates**, collectively known as **Apogee Group**.

**Donations:** Any form of corporate giving where the company offers financial assistance, products, services, or expertise to non-profit organisations, charitable causes, or individuals in need.

**Employee:** An employee of the Company, including those employed on fixed term, temporary and Director contracts.

**Facilitation Payments:** Unofficial payments made to secure or expedite a routine contractual and sales process.

**FCA:** Financial Conduct Authority.

**Risk:** An uncertain event that could significantly enhance, impede, or cause doubt about the Company's ability to achieve its objectives, including the risk of

non-compliance with the Company's legal and regulatory obligations

**Risk Owner:** The individual who is accountable for managing, monitoring, and reporting on risk exposure against a given set of business objectives, including the conduct of business in accordance with the Company's legal and regulatory obligations.

**Sponsorship:** As used in this Policy, "Sponsorship" refers to any arrangement whereby Apogee provides financial support, products, services, or anything of value to a Third Party (including charitable organisations), in return for the right to associate our image, brand or products with an activity, or to receive some other lawful benefit, such as participation in an event.

**Subsidiary:** A subsidiary is a separate legal entity that is **controlled by** Apogee Corporation Limited.

**Third Party:** An external provider or a vendor who offers goods or services to Apogee but is not part of the Company. This includes suppliers, consultants, or outsourcing firms that are not the primary business or the customer.

## 2. Overview

This policy applies to Apogee Corporation Limited and all its subsidiaries and affiliates (collectively referred to as the "Apogee Group").

### Subsidiaries and Affiliates Outside the UK:

- All subsidiaries and affiliates of Apogee Corporation Limited outside the UK are required to align with the anti-bribery and corruption standards set out in this policy.
- In addition, they must have their own local anti-bribery and corruption policy that complies with the specific laws and regulations of their jurisdiction.

The purpose of this Policy is to:

- Interpret the Bribery and Corruption requirements relevant to Apogee and set down how those requirements will be applied across the Company.
- Define the practices adopted by the Company in relation to Bribery and Corruption and the standards expected from all Employees.

It is the Company's policy to conduct all business in an honest and ethical manner. The Company has no appetite for regulatory breach, fine or censure and, therefore, takes a zero-tolerance approach to Bribery and Corruption. The Company is committed to acting professionally, fairly and with integrity in all its business dealings and relationships wherever it operates and implementing and enforcing effective systems to counter Bribery and Corruption.

### 3. Guiding Principles

The Company recognises the risk of Bribery and Corruption and will ensure there are robust systems and controls in place to identify and prevent Bribery and Corruption. 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.

#### No Employee of the Company will:

- offer, pay or accept a Bribe.
- establish any undisclosed or unrecorded fund of cash or assets for any purpose, or make any false, artificial, or misleading entries in any books or records of the Company.
- approve or make any payment for any purpose other than that described by the document supporting the payment.
- request, agree to receive or accept a Bribe from another which is intended for their own benefit or that of their family, friends, associates, or acquaintances

#### It is not acceptable for an Employee or someone on an employee's behalf to:

- give, promise to give or offer a payment, gift or hospitality of any value with the expectation or hope that a business advantage will be received, or to reward a business advantage already given.
- give, promise to give or offer a payment, gift, or hospitality of any value to a government official, agent or representative to facilitate or expedite a routine procedure.
- accept a gift, hospitality, or payment of any value from a Third Party known or suspected of offering a payment with the expectation that it will obtain a business advantage for them.
- give or accept gifts or hospitality with a value exceeding £30 (or €35) without first declaring them in accordance with the Gifts and Hospitality policy and where applicable gain approval.
- threaten or retaliate against another employee who has refused to commit a Bribery offence or who has raised concerns under this policy.
- engage in any activity that might lead to a breach of this policy.

This policy allows gifts, hospitality, and expenses to be received from Third Parties as outlined in Company's Gifts and Hospitality Policy. Inappropriate offers of Gifts or Hospitality will be recognised as such and will be declined.

Gifts, hospitality, and reimbursement of expenses will only be offered or made to Third Parties for an appropriate business purpose and should be proportionate and reasonable to that purpose.

All Employees must adhere to the Company's Gifts and Hospitality Policy and the Travel and Expenses Policy when submitting claims for expenditure.

This Policy does not permit the gift of money or loans to be made or received by an Employee.

The Company will not make, and will not accept, Facilitation Payments or 'kickbacks' of any kind. If an Employee is asked to make a payment that is disproportionate to the goods or services provided,

the matter should be reported by the Employee immediately to their line manager.

The Company's practice is not to make political contributions in any form to political causes, parties, or individual candidates. The Company will not reimburse any Employee for making political contributions.

The controls in place to manage the Risk of Bribery and Corruption will be tested periodically by the Head of Commercial Compliance for their presence and effectiveness. The results of such testing will be reported to Risk Owners, and escalated further, as necessary.

All Employees are encouraged to report any related concerns promptly by following the process set out in the Whistleblowing Policy (potentially in circumstances where the Employee may not feel willing and/or able to report their concerns to their line manager).

Non-compliance with this Policy may lead to disciplinary action.

## 4. Legal and Regulatory Obligations

As our Company operates in the UK, we must adhere to the provision outlined in the UK Bribery Act 2010.

This includes the four primary offences of outlined in the Act:

- Offering, promising, or giving a bribe (active bribery).
- Requesting, agreeing to receive, or accepting a bribe (passive bribery).
- Bribing a foreign public official.
- The corporate offence of failing to prevent bribery by an associated person for the benefit of the organisation.

The Act requires organisations to have 'adequate procedures' in place to prevent persons associated with them from committing Bribery. The Ministry of Justice has issued guidance on what these procedures should include, which is based on six principles:

- **Proportionality:** The action taken should be proportionate to the risks faced and the size of the business.
- **Top-level commitment:** Senior management should be committed to preventing Bribery and should foster a culture in which Bribery is unacceptable.
- **Risk assessment:** Regular and comprehensive assessments of the internal and external risks of Bribery should be conducted.
- **Due diligence:** Due diligence should be undertaken with respect to individuals who perform or will perform services for or on behalf of the organisation.
- **Communication (including training):** Anti-bribery policies and procedures should be clearly communicated to staff and relevant external parties.
- **Monitoring and review:** The effectiveness of anti-bribery measures should be regularly monitored and reviewed.

The Company must also be cognisant from an anti-corruption perspective of other relevant principles and requirements including the relevant obligations detailed in the SYSC Chapter of the

FCA Handbook and the FCA Financial Crime Guide, Proceeds of Crime Act 2002, the Companies Act 2006, the Money Laundering Regulations 2017, the Criminal Offences Act and the Economic Crime and Corporate Transparency Act 2023.

## 5. Anti-Bribery and Corruption Requirements

### (a) Providing and Receiving Gifts and Hospitality Amenities

We have a duty to spend the Company's resources in ethical ways. You may never provide or promise to provide anything of value to a Third Party to improperly influence a decision on their part. For guidance on when Amenities may be provided or received, consult with Apogee's Gifts and Hospitality Policy.

In addition to these principles, the Company's Gifts and Hospitality Policy sets specific limits on the value of, and the approvals required for, business amenities that may be given or received, including gifts, raffles/drawings, travel, meals, entertainment, and combinations of these categories.

### (b) Travel

Unless prohibited by a country-specific policy, the Company may pay for travel (that is, transportation and/or accommodation) for Third Parties, provided the travel is related to legitimate Company business purpose and **prior approval** has been obtained in accordance with the Travel and Expenses Policy. The following principles apply to Company -paid travel for Third Parties:

- Travel must be necessary for a legitimate business meeting or event.
- Any travel must be reasonable and consistent with the Company's Travel and Expenses policy.
- The Company must pay any expenses directly to the service provider, not the traveller. The Company must not pay per diems to the traveller.
- Sightseeing or other recreational activities are allowed only if they are minimal or incidental in nature.
- You must obtain prior approval as detailed in the Gifts and Hospitality Policy, and the Travel and Expenses Policy.

### (c) Company Events and Amenities Related to a Company Event

Apogee may invite Third Parties to attend Company Events such as:

- Company organised corporate activities
- Executive Briefing Centre/Lab visits
- Demonstrations of Company products
- Technical workshops, seminars, lunch and learns
- Trade show events
- Sales account activities and hospitality
- CIO events
- Road shows

- Advisory councils

**“Company Events”** do not include ordinary business meals or Amenities. As part of a Company Event, you may be able to provide attendees with free access to the Company Event as well as various business amenities, including gifts, travel, meals, entertainment, and other items of value, provided the Company Event is directly related to the promotion, demonstration, or explanation of Apogee products or services, provided it meets the defined thresholds outlined within the Company’s Gifts & Hospitality and Travel & Expenses policy.

When planning a Company Event or planning to invite anyone to a Company Event, the following principles apply, subject to country-specific policies:

- **The 80/20 rule:** 80% of the time spent by the Third Party should be devoted to the promotion of the Company’s business, while the remaining 20% can be devoted to leisure time and reasonable entertainment. Leisure time should emphasise the business nature of the Company Event.
- **No Cash, Reimbursement, or Per Diems:** You must not give attendees cash or cash equivalents, such as VISA/American Express or other equivalent cash gift cards, for any reason. If Apogee is paying for the cost of an amenity, such as hotel accommodations, you should pay the vendor directly rather than reimbursing or giving cash to the attendee. Rules may vary for public sector employees.
- **Events including Public Sector Officials Require Prior Approvals:** You must use the Gifts and Hospitality Expenses Request form to pre-approve Company Events that may include public sector invitees to ensure Apogee’s country-specific and recipient-specific rules are satisfied. It is advisable that public-sector entities should select who will attend a Company Apogee Event on behalf of the entity, and that the public sector official’s manager confirm in writing that the employee can attend the event. After the event, the event organiser must submit a Gifts and Hospitality declaration confirming who attended and what the attendees received at the event. In addition, you must also use the Gifts and Hospitality Expenses Request form to separately pre-approve any request to pay travel costs for public sector invitees to Company Events.
- **Events including only Commercial Sector Employees:** The Company Event organiser must maintain records of what was provided at the event and, if the total value of the Amenities provided is over £200 per person (excluding travel), records of all third-party attendees (name, email, company name, and position) and submit a Gifts and Hospitality declaration.

## **(d) Sponsorships**

Any sponsorship must receive the appropriate approval. In addition, when considering paying for a sponsorship, you must:

- Never provide a sponsorship to improperly influence anyone or obtain an improper advantage.

- Never provide a sponsorship that creates the appearance of a bribe, kickback, or other corrupt practice.
- Ensure that the sponsorship is consistent with the Company's core values.
- Record all sponsorship agreements in writing and make the payments to the entity not to an individual.
- Follow the principles in this Policy and the limitations in the Company's Gifts, Hospitality & Expenses Policy with respect to giving away anything Apogee receives for the sponsorship, such as product or tickets to the event we are sponsoring.

You must submit a request as described in the Charitable giving Policy and get advance written approval from the Company's in-house counsel if a public sector official has, or may have, an interest in the sponsorship. Sponsorship of events that are open to the public or generally open to members of a given industry or association do not require that requests be submitted through the Gifts and Hospitality Policy solely on the basis that a public sector official may attend the sponsored event. If you are not sure what action to take, please consult a director or send an e-mail to [integrity@apogee.com](mailto:integrity@apogee.com).

## **(e) Charitable Contributions & Political Contributions**

### Charitable Contributions

The Company may seek to address social needs through strategic philanthropic investments that support our communities, build brand equity, and align with the Company's business priorities. Any payment to a charitable organisation must:

- Not create the appearance of a bribe, kickback, or other corrupt practice.
- Never be used to directly procure Company future business or otherwise be made with the intent to obtain or retain business, secure an improper advantage, or induce anyone to act improperly.
- Not be used to circumvent the Company's rules relating to giving business Amenities.
- Be consistent with Apogee's Conflicts of Interest Policy.
- For more information on contributions, please see the Charitable Contributions Policy.

## **(f) Facilitation Payments**

The Company prohibits facilitation payments by Company employees or by any Third Party on the Company's behalf.

A facilitation or "grease" payment is a payment, generally of low value, made to a public sector official to facilitate or expedite a routine, non-discretionary public sector activity that the official is required to perform as a matter of course. Examples of these activities include:

- Permits, licenses, or other documents that allow companies to conduct business in a particular country.
- Processing of visas and work papers.



- Inspections related to transit of goods, for example loading and unloading of cargo.
- Certain one-time fees, such as a public sector-owned utility company activating a telephone line.

Apogee permits a facilitation payment only in cases of ‘duress,’ or ‘extortion.’ Facilitation payments may only be made where:

- The person being asked to pay fears physical harm, or imprisonment, and
- It is a one-time payment, and
- There is no safe alternative to complying with the demand.

This exception applies only to one-time payment, typically of small value. Repeated facilitation payments or facilitation payments of high value are not permitted.

You must report any demands for facilitation payments whether the demand is made directly or indirectly to the Company, or if you learn of a demand to or payment made by a Third Party acting on the Company’s behalf.

The report must be made to [integrity@apogeecorp.com](mailto:integrity@apogeecorp.com) or within 24 hours of the demand.

You should make all reasonable efforts to ensure that Third Parties acting on behalf of the Company (for example, partners, suppliers, agents, consultants or contractors) are aware of, and comply with, the Company’s policy. The Company will not reimburse Third Parties for facilitation payments.

## **(g) Accurate Books & Records**

As Company employees, we must keep books and records that accurately detail and fairly represent what we do with the Company’s resources. You must follow all expense reimbursement rules to obtain reimbursement of business Amenities. You must also follow these principles:

- You must not mischaracterise payments made to any Third Party.
- You must not create off-the-books funds or assist any Third Party in creating off-the-books funds.
- You must not enter into any side letters or side agreements.
- You must not provide excessive margins, discounts or rebates to any Third Party without a business justification, Finance approval, and review by Apogee’s in-house counsel.
- You must not use or provide marketing or business development funds (Marketing Development Funds (MDF) or Business Development Funds (BDF)) to directly or indirectly provide items of value that would otherwise breach the Integrity at Apogee Policy, the Gifts & Hospitality Policy or the Travel & Expenses Policy.
- You must follow any applicable discount pricing policies or processes.

## (h) Money Laundering

The Company must comply with all applicable laws concerning money laundering.

These laws include the Money Laundering Regulations 2017 and Proceeds of Crime Act 2002 (POCA).

'Money laundering' means the process of hiding the origin of money obtained through crime (the 'proceeds of crime') within lawful business activities. It also describes the use of any money to fund terrorism. Anti-money laundering laws help prevent lawful business from being used by criminals to conceal money, and to assist law enforcement agencies to trace and recover the proceeds of crime and terrorist funding.

**You must not:** participate in acquiring, using, converting, concealing or possessing the proceeds of crime; helping another person to do so; or assisting terrorist financing in any way.

Some "red flags" that may indicate a Third Party may be involved in money laundering or terrorist financing include:

- Providing false or misleading information.
- Secrecy concerning the source or ownership of assets.
- Connections to countries identified as non-cooperative with international efforts against money laundering or terrorism.
- Company address is a P.O. Box, not a physical site.
- Use of a shell company.
- Structuring transactions to avoid reporting requirements.
- A request that funds be transferred to an undisclosed Third Party or in another jurisdiction.
- Transactions that do not make obvious commercial sense.

You should immediately report your concerns to [integrity@apogee corp.com](mailto:integrity@apogee corp.com) if you suspect that Apogee is, or risks, participating in a transaction which may involve money laundering or terrorist financing.

## (i) Mergers and Acquisitions

Mergers and acquisitions present business opportunities for the Company, as well as risks. For example, the Company can be held accountable for the actions of an acquired company, so we must conduct anti-corruption due diligence, both prior to and after the acquisition, to evaluate the target company's internal controls and third-party relationships.

## 6. References

- [Gifts and Hospitality Declaration](#)
- Anti-Corruption Red Flags
- Conflicts of Interest Policy

- Gifts & Hospitality Policy
- Code of Conduct and Ethics
- Integrity at Apogee

## 7. Third Parties

The Company's Anti-Bribery and Corruption Policy is applicable to all Third Parties that engage with Apogee. Third Parties are obligated to abide by the policy at all times while engaged with the Company. The Company may engage Third Parties, such as agents, intermediaries, subcontractors, lobbyists, logistics providers, and other suppliers and vendors. This is one of the Company's biggest areas of risk because the Company can be held responsible for any improper actions of Third Parties. We must be extremely vigilant when we engage Third Parties and actively monitor our relationship to ensure that they will conduct business in an ethical manner and that our fee arrangements will not be used as bribes on our behalf, or for other corrupt activity.

Third Parties must be reputable. Any third-party the Company engages must be a legitimate business entity which conforms to Apogee's high ethical standards and complies with all applicable laws. Third Parties must be chosen on the merits of their services and business practices.

We conduct appropriate due diligence. Apogee is committed to conducting properly documented risk-based due diligence before retaining agents, business partners, and other Third Parties. When engaging a Third Party, you must follow any applicable onboarding processes and must document the engagement consistent with the Company's practices and procedures using approved terms and conditions.

Third Parties must be engaged for legitimate purposes. When engaging a Third Party in any transaction, you must fully understand the business rationale for engaging the Third Party and document what the Third Party did or will do to justify its payment. Among other things, you must understand the role of and need for the Third Party, ensure that the contract terms specifically describe the services to be performed, and verify that the Third Party is actually performing the work for which it is being paid.

Compensation to Third Parties must be reasonable according to the level and type of work being performed, and consistent with local laws and industry practice. Compensation may neither be paid in cash nor "off shore" (i.e., in a country or location that is not related to the location of the Third Party or the services). Discounts that we provide on our products or services to partners and commissions that we pay in connection with sales must be appropriate, properly authorized and approved, and offered for legitimate business reasons. It is important to ensure that no such discount or commission ends up in the pocket of a public sector official or is otherwise used to fund corrupt or inappropriate activities.

Third Parties must be informed of our ethical expectations and agree not to engage in bribery. The

Company expects every Third Party it engages to abide by the law and our standards for conducting business. You must follow the applicable onboarding process and must use an approved contract template when engaging a Third Party.

### Conflict of Interest Prohibition for Third Parties

It is imperative that third parties engaged in transactions avoid any conflicts of interest. Specifically, such entities should not be compensated by the Company if they hold a dual role as a consultant, paid adviser, or supplier for the customer involved in the same transaction. Third Parties are prohibited from receiving payment from the Company if they hold positions such as employee, officer, director, proxy-holder, affiliate, or shareholder with any entity that is a party to the transaction.

There are certain conditions under which a third party may be exempt from this rule, particularly when family relationships are involved. In such cases, the third party is required to:

- Fully disclose any potential conflicts of interest to the Company .
- Ensure that their family member is neither participating in nor benefiting from the transaction.
- Obtain written approval for the arrangement from both their manager and Director.

For further clarification and guidance on these matters, third parties should consult the Conflicts of Interest Policy.

Third Parties associated with public sector officials require approvals. You must obtain written approval from Apogee's in-house counsel before entering into any arrangement with a Third Party if a public sector official has, or may have, an interest, directly or indirectly, in the business opportunity.

We must be alert for "red flags" that indicate that a Third Party may engage in corrupt activities. When you learn of any signs that a Third Party may engage in improper business practices like bribery, you must take prompt action to obtain reasonable assurance that the Third Party will not engage in such practices. If you are not sure about what action to take or if the assurances are not adequate, you should report your concerns immediately to [integrity@apogeecorp.com](mailto:integrity@apogeecorp.com).

Examples of "red flags" include:

- Requests for excessive compensation, discounts, fees, or commissions.
- A public sector official requires the use of a specific Third Party.
- Comments suggesting improper conduct or bribery.
- Requests for unusual payment arrangements, like payment in a different name or unrelated country.
- Refusals to provide detailed invoices.
- Invoices that are inaccurate or reflect work that was not actually performed.
- Requests to add multiple additional subcontractors without clear business justification.

For additional information regarding the risks associated with using Third Parties, please visit the Anti- Corruption Red Flags List located on the company Intranet where you will find detailed guidance.

## 8. Roles and Responsibilities

Role	Responsibility
ELT	<p>Provide leadership and oversight of all business activity. The ELT will:</p> <ul style="list-style-type: none"> <li>● Ensure that Operational Management understands its obligations in relation to identifying and managing Bribery and Corruption Risks;</li> <li>● Receive regular reports on Risks and issues that may indicate exposure to Bribery &amp; Corruption; and</li> <li>● Take or direct appropriate action to define and implement remedial activity to mitigate Bribery and Corruption related Risks that have been identified.</li> </ul>
Operational Management	<ul style="list-style-type: none"> <li>● Ensure all Employees of the Company understand their obligations in relation to Bribery and Corruption as set out in this Policy.</li> <li>● Assess the Risk that Employees in their line may be exposed to Bribery and Corruption and, as necessary, take steps to reduce those Risks;</li> <li>● Arrange appropriate training for themselves and relevant Employees and ensure that training records are properly maintained;</li> <li>● Ensure that the risk of Bribery &amp; Corruption is appropriately assessed when reviewing and approving any gift, hospitality or expenses;</li> <li>● Maintain accurate records of gifts, hospitality and expenses given and received;</li> <li>● Provide the ELT with regular reports on Risks and issues that may indicate exposure to Bribery &amp; Corruption; and</li> <li>● Report and escalate breaches of this Policy;</li> </ul>
Employees	<ul style="list-style-type: none"> <li>● Read and understand the requirements of this Policy;</li> <li>● Adhere to the requirements detailed in this Policy</li> <li>● Undertake training as directed by management;</li> <li>● Report any concerns about inappropriate activity to <a href="mailto:integrity@apogee.com">integrity@apogee.com</a> or follow the process in the Whistleblower Policy.</li> </ul>

<p><b>Head of Commercial Compliance</b></p>	<p><b>Core Responsibilities:</b></p> <ul style="list-style-type: none"> <li>● <b>Policy Ownership:</b> The Head of Commercial Compliance is the <b>Policy Owner</b>. This means they are responsible for ensuring the Anti-Bribery and Corruption Policy is up-to-date, accurate, and aligns with relevant global and regional regulations.</li> <li>● <b>Communication and Awareness:</b> They are responsible for creating and implementing strategies to communicate and raise awareness of the policy throughout the company. This could involve training programs, information campaigns, or internal communication channels.</li> <li>● <b>Interpretation and Support:</b> The Head of Commercial Compliance interprets the policy's requirements to support the ELT (Executive Leadership Team) and Operational Management in its implementation. They provide guidance and answer any questions regarding the policy's application.</li> <li>● <b>Monitoring and Review:</b> They monitor adherence to the policy by employees and assess its overall effectiveness for the company's needs. This may involve conducting audits, analysing reports, and identifying areas for improvement.</li> <li>● <b>Recordkeeping:</b> They maintain a written record of any policy exceptions that are approved, including the reasons why the exception was granted.</li> <li>● <b>Enquiries and Delegation:</b> The Head of Commercial Compliance acts as the central contact point for any inquiries related to the policy's content. They can also delegate tasks to nominated deputies while retaining overall accountability.</li> </ul> <p><b>Collaboration:</b></p> <p>The Head of Commercial Compliance should collaborate with other departments to ensure effective implementation of the policy. This may involve:</p> <ul style="list-style-type: none"> <li>● Working with the People and Culture Team to develop and deliver anti-bribery and corruption training programs.</li> <li>● Working with Operational Management to assess bribery and corruption risks specific to different departments and roles.</li> <li>● Working with the legal department to ensure the policy complies with relevant laws and regulations.</li> </ul>
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## 9. Penalties

Non-compliance with this Policy may lead to disciplinary action.

Please refer to section 11 of the Bribery Act 2010 for further information on penalties for those who breach bribery and corruption policy or laws.

## 10. Raising a Concern

Any employee with knowledge or suspicion of any breaches of this Policy is advised to refer this matter to their line manager in the first instance. If an employee does not feel comfortable or able to do so, they should follow the guidance outlined in the Whistleblowing Policy which can be found on the Company's intranet, and report these concerns following our guidance [Whistleblowing at Apogee: Your Voice Matters](#)

For scenarios and additional guidance on recognising circumstances suggesting a risk of bribery, kickbacks or other improper conduct, visit the Anti-Corruption Red Flags Site which can also be found on the Company's intranet.

**Document Control**

DOCUMENT NAME	VERSION	MASTER COPY LOCATION
Anti-Bribery and Corruption Policy	4	

Unless stated within the body of this document, the owner is responsible for maintaining document control and facilitating compliance, as well as the management of review, updates and changes.

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**REVISION HISTORY**

Version	Date	Amended By	Summary of changes
4	2024-05-21	Keith Harvey	Updated Roles and Responsibilities

**DOCUMENT REVIEWS**

This document has been reviewed for QC purposes by the following, in addition to those on the ‘approvers’ list.

Version	Date	Name	Title / Role
4	2024-6-12	Samantha Jackson	Chief Finance Officer

**APPROVALS**

This document requires the following approvals for implementation and / or for any change in content.

Version	Date	Name	Title / Role	Approval Status (Pending/Approved)
4	2024-6-12	Samantha Jackson	Chief Finance Officer	Approved


