



**AARDVARK CLEAR MINE LTD**  
**ANTI- BRIBERY AND CORRUPTION POLICY**

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## **POLICY STATEMENT**

At AARDVARK CLEAR MINE LTD we conduct all of our business in an honest and ethical manner. We take a zero-tolerance approach to the giving and receiving of bribes and corruption in any form. AARDVARK CLEAR MINE LTD is committed to acting professionally, fairly, honestly and openly in all our business dealings and relationships. We aspire to operate to best practice standards and comply with all relevant laws in all the jurisdictions in which we operate.

AARDVARK CLEAR MINE LTD will uphold all laws relevant to countering bribery and corruption in all the jurisdictions in which we operate.

## **PURPOSE OF THE POLICY**

The purpose of this policy is to:

- set out the responsibilities of AARDVARK CLEAR MINE LTD and of those working for and on behalf of AARDVARK CLEAR MINE LTD, in observing and upholding our position on bribery and corruption; and
- provide information and guidance to those working for and on behalf of AARDVARK CLEAR MINE LTD on how to recognise and deal with bribery and corruption issues.

## **WHO IS COVERED BY THE POLICY**

This policy applies to all:

- directors and officers
- employees
- contractors
- suppliers
- joint venture partners
- agents
- representatives
- partnerships and strategic alliances

and any other relationship that is under the day-to-day management of AARDVARK CLEAR MINE LTD (together referred to as "AARDVARK CLEAR MINE LTD Personnel").

AARDVARK CLEAR MINE LTD will only use suppliers and intermediaries (such as agents, consultants and representatives)

who comply with applicable laws and have been approved in accordance with the AARDVARK CLEAR MINE LTD approval processes.

## **WHAT HAPPENS IF YOU DON'T COMPLY?**

Whether knowingly or not, if you breach the Policy or applicable laws you may be criminally liable and could also be subject to company disciplinary action including termination of your employment. It is essential that you understand what is expected of you.

Failure to report knowledge of a breach, or a suspected breach, of the Policy or failure to assist or cooperate in any investigation may also result in you being subject to disciplinary action.

## **WHAT IS BRIBERY & CORRUPTION**

Bribery is an offer, promise, giving, requesting or acceptance of something of value as an inducement or reward for doing something improper in order to gain any commercial, contractual, regulatory or personal advantage.

Corruption is the misuse of public office or a business position for private gain.

## **WHAT LAWS APPLY TO YOU?**

Both AARDVARK CLEAR MINE LTD and AARDVARK CLEAR MINE LTD Personnel are subject to anti-bribery legislation, in particular:

- UK Bribery Act 2010 (“Bribery Act”); and
- US Foreign Corrupt Practices Act 1977 (“FCPA”)

Under the Bribery Act it is an offence for an individual to:

- Give, promise or offer a bribe
- Accept, agree to receive or request a bribe
- Bribe a foreign public official

It is also an offence under the Bribery Act for a company to fail to prevent bribery. The FCPA covers the bribery of foreign public officials only.

Irrespective of where you work, as AARDVARK CLEAR MINE LTD Personnel, you must comply with both of the above pieces

of legislation, as well as any other anti-bribery laws existing in the countries within which we work.

## **GIFTS AND HOSPITALITY**

Gifts, hospitality entertainment, training, travel and promotional expenses must never be provided or accepted in order to gain competitive advantage.

The offer or receipt of hospitality, gifts or entertainment and the provision of training, travel and promotional expenses must always be:

- of a reasonable value, quantity and frequency
- not be intended to influence improperly a business relationship or transaction
- directly related to AARDVARK CLEAR MINE LTD’s business interests
- legal in the UK, US and the relevant local law
- respectful of this Policy

Gifts must not be offered to, or accepted from, government officials or representatives, their representatives, politicians or political parties.

If in doubt as to what is acceptable you must contact your line manager and obtain approval prior to accepting or offering any form of hospitality, gifts or entertainment. For the purpose of this Policy your line manager is the manager within your line or department with the title “manager” or a more senior position. This may not be your direct supervisor.

All hospitality, entertainment and gifts provided by AARDVARK CLEAR MINE LTD Personnel must be supported by valid third

party receipts evidencing expenditure where applicable and accurately recorded in the books and records of AARDVARK CLEAR MINE LTD.

Any gifts or hospitality, either offered by or received by AARDVARK CLEAR MINE LTD personnel, which is of a value

estimated to exceed £50 per person is prohibited unless approved in advance by your line manager (being the first person in your line management including “manager” in their job title).

All gifts and hospitality over £25 must be registered in the Gifts and Hospitality Register maintained



by the AARDVARK CLEAR MINE LTD Finance Manager.

Employees should refer to the AARDVARK CLEAR MINE LTD Quality Management System for specific procedures relating to this.

#### **FACILITATION PAYMENTS AND KICKBACKS**

Facilitation payments are typically small, unofficial payments made to secure or expedite a routine action by a government official. They are not commonly paid in the UK, but are common in some other jurisdictions in which we operate. AARDVARK CLEAR MINE LTD prohibits any facilitation payments being made on its behalf in connection with its operations.

If you are asked to make a payment on the company's behalf, you should always be mindful of what the payment is for and whether the amount requested relates to service legitimately received. All payments must always be backed up with appropriate documentary evidence.

Strict adherence to the Policy must be observed at all times.

The only exception to this is in circumstances where there is a real and imminent threat to the health, safety, personal security or welfare of any employee, a member of his or her family or a coworker. An example of this would be if a person makes a demand for payment together with a threat that if payment is not made the person may be detained. If, after initially declining to make a payment, you decide to make the payment due to the threat, then this exceptional circumstance must be immediately reported in writing to the AARDVARK CLEAR MINE LTD Compliance Manager at [info@AardvarkClearMine.com](mailto:info@AardvarkClearMine.com)

Kickbacks are typically payments made in return for a business favour or advantage. All workers must avoid any activity that might lead to, or suggest, that a facilitation payment or kickback will be made or accepted by AARDVARK CLEAR MINE LTD.

#### **POLITICAL & CHARITABLE DONATIONS**

AARDVARK CLEAR MINE LTD do not make contributions to political parties. We only make charitable donations that are

legal and ethical under local laws and practices. No donation may be offered or made without the prior approval of the AARDVARK CLEAR MINE LTD Compliance Manager.

To be considered acceptable any charitable payments must always be

- of a reasonable value, quantity and frequency
- of a nature that is relevant to the business, culture and circumstances
- legal in the UK, US and the relevant local law
- respectful of the Policy
- recorded in the AARDVARK CLEAR MINE LTD books

#### **CONFLICTS OF INTEREST**

AARDVARK CLEAR MINE LTD personnel must avoid conflicts of interest between their private activities or personal interests

and their responsibilities owed to AARDVARK CLEAR MINE LTD.

A conflict may arise if you or a close family member receives benefits, other than your employment benefits, as a result of your position with AARDVARK CLEAR MINE LTD. AARDVARK CLEAR MINE LTD personnel must not accept (directly or indirectly) any personal payments, services or loans from a competitor, customer, supplier or contractor of AARDVARK CLEAR MINE LTD.



Conflicts of interest are prohibited unless approved in advance by your line manager. Any suspected conflicts of interest must be declared to the AARDVARK CLEAR MINE LTD Compliance Manager.

#### **YOUR RESPONSIBILITIES**

All AARDVARK CLEAR MINE LTD personnel are expected to perform and work with honesty and integrity at all times and must comply with this Policy. You must read, understand and comply with this Policy at all times. The prevention, detection and reporting of bribery and other forms of corruption are the responsibility of all those working for AARDVARK CLEAR MINE LTD or under our control. All AARDVARK CLEAR MINE LTD Personnel are required to avoid any activity that might lead to, or suggest, a breach of this Policy.

#### **RECORD KEEPING**

We must keep financial records and have appropriate internal controls in place which will evidence the business reason for making payments to third parties.

You must declare and keep a written record of all hospitality or gifts over the value of £25 accepted by, or offered to, you; or offered by you to another party and accepted; which will be subject to managerial review and approval as discussed in this Policy. This register is held by the Finance Manager and will be reviewed on a regular basis by the Compliance Manager.

You must ensure all expenses claims relating to hospitality, gifts or expenses incurred to third parties are submitted in accordance with our expenses policy and specifically record the reason for the expenditure.

All accounts, invoices, memoranda and other documents and records relating to dealings with third parties, such as clients, suppliers and business contacts, should be prepared and maintained with strict accuracy and completeness. No accounts must be kept "off-book" to facilitate or conceal improper payments.

#### **HOW TO RAISE A CONCERN**

If you know or have reason to believe there has been improper conduct or a violation of this Policy or applicable law, you must report the incident - whether these relate to yourself, direct reports or others. You may raise your concern with any of the following:

- your line manager
- the AARDVARK CLEAR MINE LTD Compliance Manager at [ino@AardvarkClearmine.com](mailto:ino@AardvarkClearmine.com)

You should raise concerns about any issue or suspicion of malpractice at the earliest possible stage. If you are unsure whether a particular act constitutes bribery or corruption, or if you have any other queries, these should be raised with your line manager, HR or the AARDVARK CLEAR MINE LTD Compliance Manager.

Concerns should be reported by following the procedure set out in our Whistleblowing Policy. A copy of the AARDVARK CLEAR MINE LTD Whistleblowing Policy can be found on the AARDVARK CLEAR MINE LTD Quality Management System.

#### **NO RETALIATION/VICTIMISATION**

AARDVARK CLEAR MINE LTD Personnel who refuse to accept or offer a bribe, or those who raise concerns or report

another's wrongdoing, are sometimes worried about possible repercussions. We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken.

AARDVARK CLEAR MINE LTD is committed to ensuring no one suffers any detrimental treatment as a

result of refusing to take part in bribery or corruption, or because of reporting in good faith their suspicion that an actual or potential bribery or other corruption offence has taken place, or may take place in the future. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform your line manager, Compliance Manager or HR immediately. If the matter is not remedied, and you are an employee, you should raise it formally using our Grievance Procedure, which can be found in the Employee Handbook. AARDVARK CLEAR MINE LTD will not tolerate any form of victimisation against an individual who reports in good faith a suspected violation of the Policy or who assists with an investigation.

**TRAINING AND COMMUNICATION**

Training on this Policy forms part of the induction process for all new personnel. All existing Personnel will receive regular, relevant training on how to implement and adhere to this policy. Our zero-tolerance approach to bribery and corruption must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and as appropriate thereafter.

**WHO IS RESPONSIBLE FOR THE POLICY**

The Board of Directors has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it. The AARDVARK CLEAR MINE LTD Compliance Manager has primary and day-to-day responsibility for implementing this policy, and for monitoring its use and effectiveness and dealing with any queries on its interpretation. Management at all levels are responsible for ensuring those reporting to them are made aware of and understand this policy and are given adequate and regular training on it.