

Bribery & Corruption Policy

BWHL-GP-HR-033

Revision History			
Rev No.	Date	Author	Scope/Remarks
1.0	01/07/2024	Head of HR	Replaced HSP67
1.1	10/03/2025	Head of QSHE	Updated to reflect business structure change for both Brightwell Dosing Ltd (UK) and Hylab Dispensers Ltd (UK)

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1 Purpose

The purpose of this policy is to establish the protocols for protecting the company against corruption and bribery.

2 Scope

The scope of this policy defines the overarching processes and interactions of managing corruption across the business.

3 References

- ISO 9001:2015 Clauses 6, 7
- Bribery Act 2010
- Disciplinary Policy
- Whistleblowing Policy
- ESG Policy
- Gifts and Hospitality Policy

4 Abbreviations

BWHL	BWHL Group Ltd (UK)
BWD	Brightwell Dosing Ltd (UK)
HY	Hylab Dispensers Ltd (UK)
ISO	International Organisation for Standardisation
AP	Approved Person
IMS	Integrated Management System
QSHE	Quality Safety Health Environment
HoD	Head of Departments
ESG	Environment Social Governance

5 Introduction

The company and its employees and contractors will conduct its business, at all levels, in an honest and ethical manner. the company takes a zero-tolerance approach to bribery and corruption and is committed to acting professionally, fairly and with integrity in all its business dealings and relationships. the company aims to uphold all laws relevant to countering bribery and corruption, including the Bribery Act 2010, in respect of its conduct both at home and abroad.

6 Responsibilities

Employees

Have a duty to abide by the various policies and procedures and not seek a personal advantage through the company.

HoD

Act in a professional way with any of the company assets. Report any concerns immediately up the chain of command.

The AP is responsible for maintaining and retaining the documented information as required for IMS.

7 Key principles

Company Structure

The company is structured as the company BWHL Group Ltd (UK) acting as the holding company for both Brightwell Dosing Ltd (UK) and Hylab Dispensers Ltd (UK).

Bribery

Is the action of offering another individual something of value, notably money, in exchange for something which will be beneficial to the briber.

Corruption

Can apply to a large range of actions, which are essentially conducted with illegitimate and dis-honest intentions. Corruption is dishonest or fraudulent conduct by those in power, typically involving bribery.

Governance

Governance factors

Good governance is underpinned by five core principles. An organization that uses good governance is one that always, in word and action, demonstrates:

- Accountability
- Leadership
- Integrity
- Stewardship
- Transparency

8 Methods of control

The company does not foresee a high risk of bribery occurring across the business but have still placed significant control measures in place to ensure integrity across the business activities.

8.1 Control measures

- Business Development Managers report to the Sales Director on all new business
- All employees must submit evidence for business expenses
- Business expenses are ratified by HoDs
- All management levels, up to and including the Managing Director have predetermined expense limits
- Larger disbursements and foreign currency advances are arranged through finance
- Finance is responsible for the maintenance of full and accurate financial records and is answerable directly to the Managing Director
- Project teams developing new business or products shall contain at least two managers with joint access to all relevant project information
- Training relevant employees to recognise and avoid the use of bribery by themselves and others
- Encouraging employees to be vigilant and to report any suspicion of bribery, providing them with suitable channels of communication and ensuring sensitive information is treated appropriately

- Rigorously investigating instances of alleged bribery and assisting the police and other appropriate authorities in any resultant prosecution
- A Whistleblowing Policy is implemented for reporting serious wrongdoing within the company
- Taking firm and decisive action against any individual(s) involved in bribery

8.2 Entering contracts or selling business property

No employee is permitted to loan, advertise, sell (including on any internet auction site), or give to charity any company samples or branded products without the permission of the Managing Director.

No employee is permitted to enter into any private purchasing arrangements with any supplier or agents or to use the relationship with any of its suppliers or agents to obtain any gratuities, favouritism, or rewards.

8.3 Gifts & Hospitality

8.3.1 Hospitality

All the company employees must not accept offers of hospitality, including attending sporting and social functions, unless these are properly authorised and recorded by the appropriate manager. Acceptance of hospitality at relevant conferences, courses or events may be appropriate where it is clear that the hospitality is corporate rather than personal and where the company has given its consent in advance. All associated benefits, such as accommodation, travel, entertainment, and presents must be refused.

8.3.2 Gifts

As a general rule, employees should not accept gifts from suppliers, clients, customers, contractors, or any other person you deal with in your capacity as an employee of the company. If the value of the item is negligible, or if the item is presented as a seasonal gift, employees should comply with the gifts and hospitality policy.

8.4 Raising an Issue

Any employee who is concerned that an act of bribery or corruption may have been committed should refer the matter immediately to the MD via their HoD. The matter will be dealt with swiftly and thoroughly investigated.

Any employees found to be in breach of this policy may face disciplinary action.

9 Documented information

All documented information in respect to this policy or its associated references and forms are maintained as part of the document control process within the management system. Changes associated with this policy must be submitted and the review process conducted. Only after review and sign off by the approved authority can any changes be made to the master policy content.

10 Monitoring and evaluation

All documented information will be inspected as part of the internal and external verification and in compliance to the company's overarching framework and associated ISO Standards. Any

nonconformance identified is documented and a subsequently followed up to ensure future compliance is conducted.

This Policy will be reviewed periodically as part of the internal Management Review for relevance and continual improvement.

11 Verification

The policy may be subject to internal and external verification. Acceptable approaches are:

- Internal Compliance and Audit Program
- External verification (where applicable)