

Anti-bribery and corruption policy statement

Pacemaker is dedicated to ensuring that all employees conduct business in an ethical way. Working with integrity is one of our core values. Anti-bribery and corruption is therefore at the heart of our core values.

Our Anti-bribery and corruption policy is promoted throughout our business and projects.

Pacemaker does not tolerate bribery and corruption. The company will not hesitate to take legal, and/or disciplinary action against those who act in breach of this policy.

This means:

- We will not conduct business with any third parties whom it has reasonable grounds to suspect are involved in bribery or corruption
- Employees who deliberately disregard the procedures and guidelines in this policy will face disciplinary action
- Offering or accepting a bribe constitutes gross misconduct and therefore is grounds for dismissal

Anti-bribery law prohibits:

- Pacemaker employees from offering a bribe
- Pacemaker employees from accepting a bribe

There are very serious penalties for bribery offences in the UK. These include terms of imprisonment of up to ten years and unlimited fines.

All of the above underline why it is important for all our employees to observe to this policy statement and seek further guidance if required.

Over the next few years in line with the company growth Pacemaker will develop appropriate training programs to ensure all those working for Pacemaker comply with the law and the policy statement.

We will show commitment and ensure that third parties who work for our business in providing services to us and our clients (whether suppliers, agents, joint venture partners or others) do not engage in corrupt activity of any kind. Pacemaker will expect these parties to adhere to the principles set out in this policy and have equivalent standards of conduct in their organisations.

For and on behalf of Pacemaker

A handwritten signature in black ink, appearing to read "D. Salasevicius", written over a light blue horizontal line.

Dainius Salasevicius
Director
August 2023

We believe that the clients we are working with will help our business to maintain a low bribery or corruption risk profile. It is important to ensure that due diligence is exercised when choosing to work with new clients and business partners.

Pacemaker aims to create and maintain a trust-based and inclusive internal culture in which bribery and corruption will not be tolerated. We are committed to encouraging a culture where employees can raise any concerns without fear that this will lead to any detrimental consequences. Accordingly, if any employee suspects that others with whom Pacemaker does business are behaving in a corrupt manner or if any employee is offered a bribe, asked to give a bribe or is otherwise aware of potentially corrupt activity in the course of their work, they should report this immediately. This is an essential obligation for all employees. A deliberate failure to report bribery by others can lead to disciplinary sanctions and may also be helping to conceal a crime.

All employees must ensure that they read this policy statement carefully. If you have questions or comments about the policy, or require advice in relation to any matters covered in it, please contact Pacemaker director.

This policy will be reviewed yearly and developed to reflect our business growth, markets we work in and clients we work with. The policy needs to remain proportionate to anticipated risk of Pacemaker business and employees being exposed to bribery and corruption matters.

Further information can be found in the Ministry of Justice (MoJ) guidelines. Please visit the websites below.

www.justice.gov.uk/guidance/docs/bribery-act-2010-guidance.pdf

<https://www.gov.uk/anti-bribery-policy>