

Anti-Bribery Policy

Elliem Ltd is committed to conducting business with the highest standards of integrity and ethics. This Anti-Bribery Policy reflects our zero-tolerance approach towards bribery and corruption, aligning with international best practices and relevant anti-bribery laws and regulations. This policy applies to all employees and business partners associated with the Company and reflects our commitment to maintaining the highest standards of ethical conduct and integrity in all our business activities.

Elliem Ltd strictly prohibits any form of bribery, whether direct or indirect, offering or accepting, in all aspects of its business operations. Bribery includes the promise, offer, payment, or acceptance of anything of value, including but not limited to money, gifts, favours, or other inducements, with the intent to improperly influence any individual or organization.

We commit to complying with all applicable anti-bribery laws, regulations, and guidelines in the jurisdictions in which we operate. This includes, but is not limited to, the Bribery Act 2010 in the United Kingdom. Employees must be familiar with and adhere to the specific anti-bribery laws applicable to their roles and responsibilities.

The Company acknowledges that legitimate business-related gifts, hospitality, and entertainment can be a customary part of building relationships and conducting business. However, such activities must be reasonable, proportionate, and comply with applicable laws. Employees must not offer or accept gifts, hospitality, or entertainment if it could influence, or be perceived to influence, a business decision or create an obligation.

The Company strictly prohibits the making or acceptance of facilitation payments. Facilitation payments, also known as "grease payments," are small payments or bribes made to expedite routine governmental actions or services to which an individual or entity is already entitled. Employees must refrain from engaging in or facilitating such payments.

The Company is committed to conducting thorough due diligence on its business partners, including agents, suppliers, contractors, and consultants. Before engaging in any business relationship, employees must ensure that potential business partners uphold comparable anti-bribery standards and comply with applicable laws.

The Company encourages all employees, contractors, and business partners to report any suspected or actual instances of bribery promptly. The Company will investigate all reported incidents in a fair and confidential manner. The Company will protect whistle-blowers from retaliation, and individuals who make reports in good faith will not suffer adverse consequences.

Non-compliance with this Anti-Bribery Policy may result in disciplinary action, including termination of employment, contract termination, legal action, and other appropriate measures as determined by the severity of the offense.

This Anti-Bribery Policy will be reviewed periodically to ensure its effectiveness and relevance to the Company's operations. Amendments or updates will be communicated to all employees and relevant stakeholders.

The Elliem Ltd Anti-Bribery Policy reflects our commitment to maintaining the highest standards of ethical conduct and integrity in all our business activities.

Jennie Clark
Managing Director

Last review and update July 2023