

## Anti-Bribery and Corruption Statement

Oracle Special Metals Ltd is committed to upholding the highest standards of ethical conduct and integrity in all its business activities. It is the responsibility of every employee and, anyone representing Oracle Special Metals Ltd, to maintain the company's reputation by conducting business with honesty and professionalism.

Oracle Special Metals Ltd recognises that bribery and corruption negatively impact business by undermining good governance and distorting free markets.

Oracle Special Metals Ltd places great importance on transparency and ethical practices in all aspects of business and has a firm stance against bribery with a zero-tolerance approach for all forms of direct and indirect bribery. This statement is applicable to every member of our team including agents and consultants as well as any third parties acting on behalf of Oracle Special Metals Ltd.

The senior management is fully committed to eliminating bribery, in accordance with the Bribery Act 2010. To achieve this, Oracle Special Metals Ltd has issued an anti-bribery and corruption statement which includes a specific policy on gifts and corporate hospitality outlined in the Staff Handbook. It is mandatory for all employees to familiarise themselves and comply with the Anti-Bribery and Corruption Statement to ensure a fair and transparent work environment.

A bribe is a financial advantage or other reward that is offered to, given to, or received by an individual or company, whether directly or indirectly, to induce or influence that individual or company to perform public or corporate functions or duties improperly. Employees and others acting for or on behalf of Oracle Special Metals Ltd are strictly prohibited from making, soliciting, or receiving any bribes or unauthorised payments. Oracle Special Metals Ltd accepts transparent, proportionate, reasonable and bona fide hospitality and promotional expenditure, whether given or received, as part of its anti-bribery measures. A breach of these policies by an employee or associated representative will be treated as grounds for disciplinary action. Employees and other individuals acting for the company should note that bribery is a criminal offence that may result in up to 10 years imprisonment and/or a fine not exceeding the statutory maximum for the individual and the company.

Oracle Special Metals Ltd has a policy of not conducting business with service providers, agents or representatives that do not support appropriate anti-bribery and corruption objectives. Preventing bribery is a collective effort and its success depends on the commitment of all employees and those acting on the company's behalf. Therefore, all employees and others acting for, or on behalf of, the company are encouraged to report any suspected bribery in accordance with the procedures set out in the policies to the Managing Director. The Company will support any individuals who make such a report in good faith.

30/11/2023

Oracle Special Metals Ltd Unit 2 Lennox Road, Basingstoke, RG22 4AP, United Kingdom  
Telephone: 01256 975 005  
Managing Directors: Rupert Gordon & Mark Glynn

