



ANTI-BRIBERY & CORRUPTION POLICY

Organisation	Nexis Worldwide Limited
Policy owner	Kate Bohn, Director
Version	1.0
Effective date	May 2026
Review date	May 2027
Applies to	All directors, employees, contractors, agents and representatives acting on behalf of Nexis Worldwide Limited

1. Purpose and scope

Nexis Worldwide is committed to conducting all business with integrity, transparency and in full compliance with applicable anti-bribery and corruption laws, including the UK Bribery Act 2010.

This policy sets out the standards of conduct expected of everyone who works for or on behalf of Nexis Worldwide, and explains how we recognise, prevent and report bribery and corruption.

This policy applies to all directors, employees, contractors, consultants, agents and any third parties acting on our behalf, regardless of location.

2. Policy statement

Nexis Worldwide has a zero-tolerance approach to bribery and corruption. We will not offer, pay, request or accept bribes in any form — directly or indirectly — whether in dealings with public officials, private sector counterparts or any other party.

3. What is bribery?

Bribery is the offering, giving, receiving or soliciting of something of value in order to influence a decision or obtain an improper advantage. It can take many forms, including:

- Cash payments or financial transfers
- Gifts, hospitality or entertainment that are excessive, inappropriate or offered with the intention of influencing a decision
- Facilitation payments — unofficial payments made to secure or speed up routine actions by public officials
- Loans, shares, employment offers or other non-cash benefits
- Donations, sponsorships or charitable contributions made with corrupt intent

4. Gifts and hospitality

Reasonable, proportionate gifts and hospitality are a legitimate part of doing business. However, they must never be used to improperly influence decision-making.

4.1 Acceptable

- Modest gifts of a promotional or ceremonial nature
- Business meals or entertainment that are reasonable in value, infrequent and clearly related to a legitimate business purpose
- Hospitality at industry events where attendance has a genuine professional benefit

4.2 Not acceptable

- Gifts of cash or cash equivalents (vouchers, gift cards)
- Gifts or hospitality offered during a procurement or decision-making process involving the recipient
- Anything that could be perceived as creating a sense of obligation
- Hospitality that is lavish, unusually frequent or disproportionate to any legitimate business purpose

Where there is any doubt, seek guidance from the policy owner before offering or accepting a gift or invitation.

5. Payments to third parties

Nexis Worldwide takes care when appointing third parties — including agents, consultants and intermediaries — to ensure they share our commitment to ethical conduct.

We will not use third parties as a conduit for payments that we would not make directly. Any third party acting on our behalf must be made aware of this policy and agree to comply with its principles.

6. Responsibilities

6.1 All individuals covered by this policy must:

- Read, understand and comply with this policy
- Refuse any offer of a bribe and report it immediately
- Never offer, promise or give anything of value in order to obtain an improper advantage
- Raise concerns promptly if they suspect bribery or corruption has occurred or is at risk of occurring
- Cooperate fully with any investigation

6.2 The policy owner (Director) is responsible for:

- Maintaining and reviewing this policy
- Ensuring appropriate communication and awareness
- Overseeing due diligence on third parties
- Investigating any reported concerns

7. How to raise a concern

Anyone covered by this policy who has a concern, suspicion or is asked to act in a way that conflicts with it should raise the matter promptly.

Concerns can be raised directly with Kate Bohn (Director) by email or in writing. All concerns will be treated seriously, investigated appropriately and handled with discretion.

Nexis Worldwide will not tolerate retaliation against anyone who raises a concern in good faith. Any individual who suffers adverse treatment because of raising a concern will have recourse to appropriate remedies.

8. Consequences of non-compliance

Breach of this policy is a serious matter. Depending on the severity, it may result in:

- Termination of employment or contract
- Referral to relevant law enforcement authorities
- Civil or criminal liability for the individual and/or Nexis Worldwide

The UK Bribery Act 2010 provides for unlimited fines and imprisonment of up to ten years for individuals found guilty of bribery offences.

9. Record keeping

Nexis Worldwide maintains accurate financial and business records. All expenses, gifts and hospitality must be recorded truthfully and transparently.

No off-the-books accounts, funds or transactions will be created or maintained.

10. Review

This policy will be reviewed annually or following any material change in law, regulation or business structure. The policy owner is responsible for ensuring the policy remains current and fit for purpose.

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