

SKD018/I	03/24	RR
Review Date		03/25



## **Anti Bribery and Anti-Corruption Policy and Plan**

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Stormking has a clear anti-corruption policy. We fully support our employees to make decisions in line with our anti-corruption policy.

Our corporate conduct is based on our commitment to acting professionally; fairly and with integrity and does not tolerate any form of bribery or corruption.

This policy applies to Stormking employees (staff, contract and temporary) and extends to all our business dealings and transactions in all countries in which we operate.

We will encourage the adoption of this policy amongst our business partners including contractors, suppliers and customers.

### **Policy**

Our Corporate Responsibility Policy sets out our commitment to operate responsibly and to engage with our stakeholders to manage the social, environmental and ethical impacts of both our activities and theirs.

Stormking does not engage in bribery or any form of unethical inducement or payment including facilitation payments and 'kickbacks.' All employees are required to avoid any activities that might lead to, or suggest, a conflict of interest with the business of the Company.

Employees have strict guidelines regarding hospitality and gifts accepted or offered, which are subject to managerial review. Stormking does not make direct or indirect contributions to political parties.

We will constantly uphold all laws relating to anti-bribery and corruption in all the jurisdictions in which we operate, and are bound by the laws of the UK, including the Bribery Act 2010, in regards to our conduct.

### **Responsibilities**

The Corporate Responsibility Committee is responsible for implementing this policy. If any instance of bribery or corruption is identified, the company will take remedial steps immediately.

### **Training and communications**

This policy and relevant guidance will be communicated to employees across the Company through our established internal communication channels. We will also communicate this policy to our suppliers, contractors and business partners and wider stakeholders.

### **Raising concerns and seeking guidance**

Employees are encouraged to raise concerns about any instance of malpractice at the earliest possible stage.

### **Monitoring and review**

The Stormking Compliance Committee will review the implementation of this policy in respect of its suitability, adequacy and effectiveness and make improvements as appropriate.

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### Internal controls and audit

Stormking has established mechanisms to maintain accurate records - available for inspection - which properly and fairly document financial transactions and agreements. Internal control systems are subject to regular audits to provide assurance that they are effective in countering corrupt practices.

A handwritten signature in blue ink, appearing to read "C. Cherry".

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Craig Cherry  
Managing Director  
6<sup>th</sup> March 2024