

Anti-Bribery and Corruption Policy

The purpose of this policy is to establish controls to ensure compliance with all applicable anti-bribery and corruption regulations and to ensure that Ligentia conducts business in a socially responsible manner.

Bribery and Corruption

Bribery means the offering or providing, promising, giving, accepting or soliciting of an advantage (loan, gift, trip, entertainment, donation, payment, or any other thing of value) as an inducement for an action which is illegal, unethical, a breach of trust, or to secure an improper advantage.

Acts of bribery are designed to influence individuals to act dishonestly in the performance or discharge of their duty.

Corruption means dishonest activity in which a director, executive, manager, employee or contractor of an entity acts contrary to the interests of the entity and abuses his/ her position of trust in order to receive some personal gain or advantage for him or herself or for another person or entity.

Employees and others acting for or on behalf of Ligentia must not engage in any form of bribery or corruption, either directly or through any other party (such as an agent or distributor). Specifically, employees must not bribe a foreign public official anywhere in the world.

Gifts and Hospitality

Employees and others acting for or on behalf of Ligentia are strictly prohibited from making, soliciting or receiving any bribes or unauthorised payments. As part of our anti-bribery policies, Ligentia is committed to only offer and receive transparent, proportionate, reasonable and legitimate hospitality, gifts and promotional expenditure or charitable giving.

Responsibility

A breach of this ethical behaviour policy by an employee will be treated as grounds for disciplinary action, which may result in a finding of gross misconduct and immediate dismissal.

Ligentia will not conduct business with service providers, agents or representatives that do not support and commit to follow Ligentia's anti-bribery and corruption objectives.

Monitor and Review

The board of directors will monitor the effectiveness and review the implementation of this policy, considering its suitability, adequacy and effectiveness. Any improvements identified will be made as soon as possible. Internal control systems and procedures will be subject to regular audits to provide assurance that they are effective in countering bribery and corruption.

This policy may be amended at any time