

## Supreme Coatings Limited Anti-Bribery Policy

Version	Date	Review	Changes Made	Approved By	Position
1.0	03 April 2025	03 April 2026	New Policy	Chris Every	Director

**1. Purpose** Supreme Coatings Limited is committed to conducting business with integrity, transparency, and accountability. This policy establishes our stance against bribery and corruption, ensuring compliance with all applicable anti-bribery laws.

**2. Scope** This policy applies to all employees, directors, contractors, suppliers, and business partners of Supreme Coatings Limited. It covers all business dealings and transactions in every country where we operate.

**3. Definition of Bribery** Bribery is defined as offering, giving, receiving, or soliciting anything of value to improperly influence a business decision or gain an unfair advantage. This includes, but is not limited to:

- Cash payments
- Gifts, hospitality, or entertainment
- Political or charitable donations
- Favourable treatment or employment opportunities
- Kickbacks or commissions

**4. Policy Statement** Supreme Coatings Limited has a zero-tolerance approach to bribery and corruption. We strictly prohibit:

- Offering or accepting bribes, whether directly or indirectly.
- Making facilitation payments (unofficial payments made to secure or expedite routine government actions).
- Engaging in corrupt activities that could compromise the integrity of our business.

### 5. Gifts & Hospitality

- Modest and reasonable gifts and hospitality may be permitted if they are for legitimate business purposes and comply with company guidelines.
- Any gift or hospitality that could be perceived as an attempt to influence a decision must be declared and approved in accordance with internal procedures.

### 6. Third-Party Relationships

- All third parties acting on behalf of Supreme Coatings Limited must comply with this policy.
- Due diligence and risk assessments will be conducted before engaging with business partners, suppliers, and intermediaries.
- Contracts with third parties will include anti-bribery clauses to ensure compliance.

## **7. Reporting & Whistleblowing**

- Employees and third parties are encouraged to report any suspected bribery or corruption through the company's confidential reporting channels.
- No one will suffer retaliation for refusing to participate in bribery or for reporting concerns in good faith.

## **8. Compliance & Training**

- All employees must complete anti-bribery training and acknowledge their understanding of this policy.

## **9. Consequences of Non-Compliance**

- Any breach of this policy will result in disciplinary action, which may include termination of employment or contracts.
- Legal action may be taken against individuals or entities found to be in violation of anti-bribery laws.

**10. Review & Approval** This policy is reviewed annually to ensure its effectiveness and alignment with legal and regulatory requirements.