



CS Electronics [UK] Ltd Anti Bribery Policy

December 2021

The offering or accepting of any gift, loan, payment, reward or advantage for personal gain as an encouragement to do something which is dishonest, illegal or a breach of trust and is strongly prohibited by CS Electronics [UK] Ltd

With bribery being a criminal offence, CS Electronics [UK] Ltd expects and requires compliance, from everyone connected with our business, with the highest ethical standards and anti-bribery laws applicable.

CS Electronics [UK] Ltd will not tolerate have corrupt activities in any form, whether committed by an employee or by third parties acting for or on behalf of CS Electronics [UK] Ltd.

The quality of being totally honest, straightforward and having strong moral principles in all areas of our company's operations is of complete utmost importance.

We at CS Electronics [UK] Ltd, convey to all employees and interested parties the rules of our company in relation to our unequivocal stance towards the eradication of bribery and our commitment to ensuring that CS Electronics [UK] Ltd conducts its business in a fair, professional and legal manner.

Bribery is a criminal act punishable under law of The Bribery Act 2010 and if found guilty by a court of law, the penalties under The Bribery Act 2010 are severe.

There is a maximum penalty of 10 years imprisonment and/or an unlimited fine for individuals. Corporates face an unlimited fine including in respect of the corporate offence.

This includes:

- ❖ The offer of a bribe to a person or company
- ❖ Acceptance of a bribe from a person or company.
- ❖ The bribery of a foreign official



- ❖ As acting as a commercial organisation failing to prevent a bribe.

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The act of corruption is the misuse of office or power for private gain. Bribery is a form of corruption which in the course of business giving or receiving money, gifts, meals, entertainment or anything else of value as an inducement to a person to do something which is dishonest or illegal.

This policy applies to all employees, regardless of seniority or site. It also extends to anyone working for or on our behalf e.g. those engaged by us on a self-employed basis or an agency arrangement.

It is prohibited, directly or indirectly, to offer, give, request or accept any bribe i.e. gift, loan, payment, reward or advantage, either in cash or any other form of inducement, to or from any person or company in order to gain commercial, contractual or regulatory advantage for the company, or in order to gain any personal advantage for an individual or anyone connected with the individual in a way that is unethical.

It is also prohibited to act in the above manner in order to influence an individual in his capacity as a foreign public official.

You should not make a payment to a third party on behalf of a foreign public official. If you are offered a bribe, or a bribe is solicited from you, you should not agree to it unless your immediate safety is in jeopardy.

You should immediately contact a Director so that action can be taken if considered necessary. You may be asked to give a full written account of events.

If you, as an employee or person working on our behalf, suspect that an act of bribery, or attempted bribery, is/has taken place, even if you are not personally involved, you are expected to report this to a Company Director. You may be asked to give a written account of events.



The appropriate checks will be made before engaging with suppliers or other third parties of any kind to reduce the risk of our business partners breaching our anti-bribery rules

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CS Electronics [UK] Ltd will undertake that all of its transactions, including any sponsorship or donations given to charity, are made transparently and legitimately.

CS Electronics [UK] Ltd will take any actual or suspected breach of this policy extremely seriously and will carry out a thorough investigation should any instances arise.

We will uphold laws relating to bribery and will take disciplinary action against any employee, or other relevant action against persons working on our behalf or in connection with us, should we find that an act of bribery, or attempted bribery, has taken place.

This action may result in your dismissal if you are an employee, or the cessation of our arrangement with you if you are self-employed, an agency worker, contractor etc.

The giving and receiving of gifts and hospitality where nothing is expected in return helps form positive relationships with third parties where it is proportionate and properly recorded. This does not constitute bribery and consequently such actions are not considered a breach of this policy.

Gifts that include event tickets when not used in a hosted business context, monies, flowers, vouchers, food, drink, loans or services given or received as a mark of friendship or appreciation.

Hospitality includes entertaining; meals or event tickets when used in a hosted business context given or received to initiate or develop relations.

Hospitality will become a gift if the host is not present.

No gift should be given nor hospitality offered by an employee or anyone working on our behalf to any



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party in connection with our business without receiving prior written approval from a Director.

As the law is constantly changing, this policy is subject to review and the Company reserves the right to amend this policy without prior notice.

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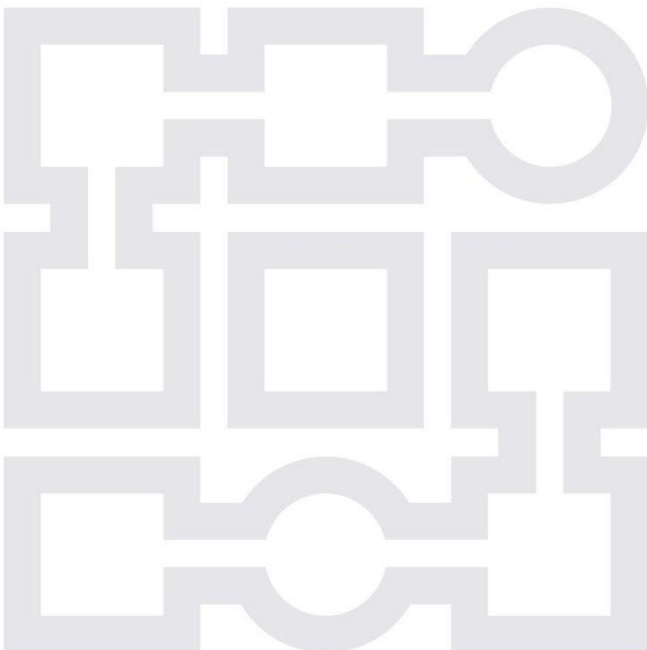
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For any queries or further detailed information related to our Anti Bribery Statement linked to this business please contact:

Liane Stuebing-Exner

Liane Stuebing-Exner.
Managing Director.



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