

ANTI-BRIBERY STATEMENT

Solentim Ltd (the **Company**) operates in overseas markets where bribery can be commonplace.

The Company is committed to transparency in all its business activities and neither condones the use of, nor employs bribery, including bid-rigging, to achieve a competitive advantage. Bribery is defined as giving someone a financial or other advantage to encourage that person to perform their function or activity improperly, or to reward that person for having already done so. For example, this would cover seeking to influence a decision maker by giving some extra benefit beyond that which can be legitimately offered as part of a tender process.

Normal levels of hospitality are acceptable and do not constitute bribery, provided that the level of hospitality offered is reasonable and proportionate. Facilitation payments, which induce officials to perform routine functions they are otherwise obligated to perform, are considered to be bribes.

Giving or receiving bribes is strictly against the Company's policy. The Company will take all reasonable measures to prevent bribery by its Staff, Distributors or Representatives in the course of its business activities. Any act that has the effect, or might be construed as having the effect, of inducing or encouraging any payment arrangements to be made or modified to the advantage of any party involved, will not be entered into. The Company's Financial Authorisation Procedures will be utilised to ensure that all significant financial transactions are properly approved at the appropriate seniority level.

At the start of any appropriate commercial transaction, due diligence will be performed to assess the risk that bribery may be involved. In particular, this will apply to any persons engaged to represent the Company in overseas markets. Due diligence may include internet searches, consultations with UK diplomatic posts or UKTI.

Staff need to satisfy themselves that any persons or organisations performing services for the Company for example distributors, are genuine and trustworthy. Personal contact with such persons is a preferred method of establishing trustworthiness. The extent of any due diligence should be proportionate to the assessed risk. The Company will communicate its Anti-Bribery Statement to any organisations with which it seeks to do business. This may be achieved formally by providing a copy of this Anti-Bribery Statement, informally as part of verbal or electronic discussions with interested parties or via its website.

In all cases however, communication of the Anti-Bribery Statement will be noted in the appropriate contract files. The Company is committed to continuous improvement of its anti-bribery procedures.

The Company will monitor the effectiveness of its procedures as it enters new markets or to keep pace with any changes in bribery legislation.