

XLN anti-bribery policy

Introduction

Bribery is a criminal offence that can result in fines for the Company and fines and / or imprisonment for individuals. XLN prohibits any form of bribery. We require compliance from everyone connected with our business, with the highest ethical standards and anti-bribery laws applicable. Integrity and transparency are of utmost importance to us and we have a zero tolerance attitude towards corrupt activities of any kind, whether committed by Company employees or by third parties acting for or on behalf of the Company.

Policy

It is prohibited, directly or indirectly, for any employee or person working on our behalf 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. If you are unsure in particular situation then you should discuss this with your line manager.

If we suspect that you have committed an act of bribery or attempted bribery, an investigation will be carried out and, where appropriate, action may be taken against you which may result in the cessation of our business arrangement with you.

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

Facilitation payments

Facilitation payments are typically small, unofficial payments made to secure or expedite a routine government action by a government official. XLN does not make facilitation payments of any kind.

Gifts and hospitality

We realise that the giving and receiving of gifts and hospitality as a reflection of friendship or appreciation where nothing is expected in return may occur. This does not constitute bribery where it is proportionate and recorded properly.

No gifts should be given nor hospitality offered by anyone working on our behalf to any party in connection with our business without receiving prior written approval from the Company.

A record must be made of every instance in which gifts or hospitality are given or received. A gift and hospitality register is held by the XLN HR team, and all gifts of a market value **over £50** and offers of hospitality with a value of **more than £250** must be notified to this list. To ensure transparency and compliance with legislative requirements it is important this is an accurate register. Failure to register a gift or hospitality will result in an investigation and, in line with our disciplinary procedure, where appropriate, action may be taken against you.

Declaration of interests

All of the Company' directors, employees, licensees, officers, consultants, joint venture partners and agents must declare any personal or business interests that they or a close relative has in relation to any current or future business transaction involving the Company. Any such interests must be reported to the Chief Finance Officer or Head of Legal at XLN.