



## Anti Bribery and Corruption Policy

### Policy Statement

Hanley Calibration are committed to the highest standards of integrity. We conduct and adopt a zero-tolerance approach to bribery and corruption. This policy applies to all our employees and independent contractors.

Bribery and corruption remains' a major issue in world trade, despite the dedicated efforts to prevent it from occurring in societies, it;

- diverts money and other resources from those who need it the most
- hinders economic and social development
- damages businesses and thereby increasing the cost of goods and services.

Our legal obligations are primarily governed by the Criminal Justice (Corruption Offences) Act 2018. We run our business with integrity and in an honest and ethical manner. All of us must work together to ensure it remains untainted by bribery or corruption. This policy is a crucial element of that effort. It has the full support of our Senior Management team. It sets out the steps all of us must take to prevent bribery and corruption in our business and to comply with relevant legislation.

### What is Bribery or Corruption

Corruption is the misuse of office or power for private gain. Bribery is a form of corruption. It includes offering, promising, giving, accepting, or seeking a bribe. A bribe is a financial or other advantage, promised, requested, or given to induce a person to perform a relevant function or activity improperly or to reward them for doing so. In practical terms, a financial or other advantage is likely to include cash or cash equivalent, gifts, meals, entertainment, services, loans, preferential treatment, discounts, or anything else of value. The timing of the bribe is irrelevant, and payments made after the relevant event will still be caught, as will bribes that are given or received unknowingly. It is not necessary for the individual or business actually to receive any benefit as a result of the bribe.

All forms of bribery and corruption are strictly prohibited within Hanley Calibration. This means that you must not:

- give or offer any payment, gift, hospitality or other benefit in the expectation that a business advantage will be received, or to reward any business received;
- accept any offer from a third-party that you know or suspect is made with the expectation that we will provide a business advantage for them or anyone else;
- give or offer any payment to a government official in any country to facilitate or speed up a routine or necessary procedure.
- No person must threaten or retaliate against another person who has refused to offer or accept a bribe or who has refused to offer or accept a bribe or who has raised concerns about possible bribery or corruption.

## Who can be involved in Bribery?

Bribery and corruption may be committed by our:

- employees, directors, contractors or anyone who has authority to do things on our behalf;
- representatives and other third parties who act on our behalf;
- suppliers;
- clients (because they might try to induce one of our people to give them more favourable terms);

Bribery can occur in both the public and private sectors. The person receiving the bribe is usually in a position to influence the award or the progress of the organisation, sometimes a government or other public official.

## Legal Position on Bribery

Bribery and corruption are criminal offences. It is illegal:

- to pay or offer to pay a bribe;
- to receive or agree to receive a bribe;
- to bribe a foreign public official.
- A commercial organisation can also commit an offence if a person associated with it bribes another person intending to obtain or retain an advantage for the organisation.

It does not matter whether the bribery or corruption occurs in Ireland or abroad. An act of bribery or corruption committed abroad may well result in a prosecution in Ireland. Nor does it matter whether the act is done directly or indirectly.

## Our Position on Bribery

Our position is simple: Hanley Calibration conduct our business to the highest legal and ethical standards. We will not be party to corruption or bribery in any form. Such acts would damage our reputation and expose us, and our employees and representatives, to the risk of regulatory action, fines and imprisonment. We take a zero-tolerance approach to bribery and corruption by our people and our third-party representatives.

## Common indicators of Corruption and Bribery

Common indicators of bribery and corruption include those listed below. There may well be others:

- payments are for abnormal amounts or purposes (e.g. commission), or made in an unusual way, e.g. what would normally be a single payment is made in stages, through a bank account never previously used, or in a currency or via a country that has no connection with the transaction;
- process is bypassed for approval or sign-off of terms or other commercial matters or we are prevented from or hindered in monitoring commercial processes;
- individuals are secretive about certain matters or relationships and/or insist on dealing with them personally; they may make trips at short notice without explanation, or have a more lavish lifestyle than expected;
- decisions are taken for which there is no clear rationale;
- records are incomplete or missing.

## Responsibility

The Managing Director has overall responsibility for this policy and is responsible for ensuring this policy is adhered to by all employees and independent contractors. Hanley Calibration expects all employee to take responsibility in;

- reading and being aware of the contents of this policy;
- complying with this policy;
- reporting cases where you know, or have a reasonable suspicion, that bribery or corruption has occurred or is likely to occur.

## How to Report A Concern

Each of us has a responsibility to speak out if we discover anything corrupt or otherwise improper occurring in relation to our organisation. We cannot maintain our integrity unless we do so. If you discover or suspect bribery or corruption, whether by another employee, independent contractor, a third-party representative, one of our suppliers, anyone else perhaps even a client.

- You must inform the Managing Director.
- You must make your report as soon as reasonably practicable. You may be required to explain any delays.
- We can ensure that Hanley Calibration will not penalise anyone for reporting a concern.

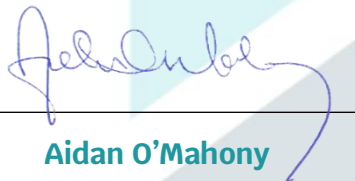
## Communication and Awareness of this Policy

This policy is available on the Hanley Calibration Website and HR Locker. Training on this policy forms part of the induction process for all individuals who work for us, and regular training will be provided as necessary.

## Consequences of failing to comply

We take compliance with this policy very seriously. Failure to comply puts both you and our business at risk. You may commit a criminal offence if you fail to comply with this policy. The criminal law relating to bribery and corruption carries severe penalties. Due to the importance of this policy, failure to comply with any requirement may lead to disciplinary action under our procedures, which may result in dismissal for gross misconduct.

Signed:



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**Aidan O'Mahony**  
*Managing Director*