

**ANTI-BRIBERY AND CORRUPTION POLICY STATEMENT**

Lunar Ltd is committed to applying the highest standards of ethical conduct and integrity in its business activities. Every employee and individual acting on Lunars behalf is responsible for conducting company business honestly and professionally.

Lunar considers that bribery and corruption has a detrimental impact on business by undermining good governance and distorting free markets.

Lunar benefits from carrying out business in a transparent and ethical way and by helping to ensure that there is honest, open and fair competition in our sectors. Where there is a level playing field, Lunar can lead the market by delivering excellent services to its customers.

Lunar does not tolerate any form of bribery by, or of, its employees or any persons or companies acting for it or on its behalf. Senior management are committed to implementing and enforcing effective systems to prevent and eliminate, in accordance with the Bribery Act 2010.

Lunar has issued an Anti-Bribery Policy. The Anti-Bribery policy applies to all employees and they are required to familiarise themselves and comply with the policy.

A bribe is a financial advantage or other reward that is offered to, given to, or received by an individual or company (whether directly or indirectly) to induce or influence that individual or company to perform public or corporate functions or duties improperly.

Employees and others acting for or on behalf of Lunar are strictly prohibited from making, soliciting or receiving any bribes or unauthorised payments. As part of its anti-bribery measures, Lunar is committed to engage only in transparent, proportionate, reasonable and bona fide hospitality and promotional expenditure.

A breach of the Lunar Anti-Bribery policy by an employee will be treated as grounds for disciplinary action, which may result in a finding of gross misconduct and immediate dismissal. Employees acting for Lunar should note that bribery is a criminal offence that may result in up to 10 years’ imprisonment and/or an unlimited fine for the individual and an unlimited fine for Lunar.

Lunar will not conduct business with service providers, agents or representatives that do not support the company’s anti-bribery objectives.

The success of the company anti-bribery measures depends on everyone playing their part in helping to detect and eradicate bribery. Therefore, all employees and others acting for, or on behalf of, Lunar are encouraged to report any suspicious activity to the Managing Director, the management will support any individuals who make such a report in good faith.

At Lunar we are committed to doing the right thing, the right way. Our conduct and behaviours typify the standards and behaviours that we uphold as a company, to ensure that the highest standards of honesty and integrity are maintained. This is more important than ever because of the strict new rules brought in by the new Bribery Act.

We operate a zero-tolerance approach to the making or receiving of bribes or corrupt payments, in any form. This type of conduct is absolutely prohibited, whether committed by employees or anyone else acting on the Company’s behalf.

This policy sets out what is and is not acceptable in general terms, but if you are in any doubt as to whether any conduct could amount to bribery, the matter should be referred to the Managing Director who is the Officer responsible for this policy. It is essential that you read and comply with this policy.

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**1. ABOUT THIS POLICY**

This policy sets out what we must all do to help prevent bribery in all its forms. A bribe may include any payment, benefit or gift offered or given with the purpose of influencing a decision or outcome. The bribe may not always be of a large value. It could be a lunch or an invitation to a sporting event.

Lunar is fully committed to complying with its obligations under applicable legislation, including the Bribery Act 2010 (the “Act”), and ensuring that no bribes or corrupt payments are made, offered, sought or obtained by anyone acting on its behalf, to anyone.

**2. WHO MUST COMPLY?**

The Lunar Ltd Anti-Bribery policy is mandatory for all Lunar Ltd employees, distributors, sub-contractors and suppliers. All of these groups are expected to conduct themselves in accordance with the standards set out in this policy.

It is important that you take the time to read and comply with this Policy. The prevention, detection and reporting of any bribery in any form is the responsibility of all employees across the company and all individuals and entities over which Lunar has control. Appropriate confidential channels for employees and Business Partners are in place to report any suspicion of bribery, these are described later in this Policy. Any failure to comply with this Policy will be treated seriously and may result in disciplinary action.

**3. HOW DO YOU COMPLY?**

You must read and abide by the terms of this Policy. You may also be required to provide written confirmation that you will comply with this policy.

**4. WHAT HAPPENS IF YOU DON'T COMPLY?**

For Employees:

Any act of bribery, in whatever form is unacceptable. We will consider taking disciplinary action against anyone who fails to comply with the anti-bribery policy up to and including dismissal. Failure to comply with this policy may also leave you open to a criminal prosecution under the Act. An offence under the Act can result in a fine and/or up to a maximum of 10 years imprisonment.

For Lunar Ltd:

A breach of this Policy by an employee or business partner could result in the Company breaching the Act. An offence under the Act can result in the business being fined and would likely lead to negative publicity and serious damage to the reputation of the Lunar brand.

**5. WHAT YOU CANNOT DO**

Prohibited Conduct

The following conduct is absolutely prohibited under this Policy:

Making unofficial payments to officials in order to obtain any permission or permit;

Appointing any third party or supplier to act on behalf of Lunar who you know or have good reason to believe to have engaged in any corrupt or unlawful conduct including any offences under the Act; or

Paying any third party for the purposes of being a ‘fixer’ to open doors.

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### Facilitation Payments

Facilitation payments ('facilitating', 'speed', 'back-hander' or 'grease' payments) are any payments, usually small cash payments made to low-level officials, as a bribe to secure or expedite the performance of a routine or necessary action or level of service.

Lunar employees must never offer, pay, solicit or accept bribes in any form, including facilitation payments.

Lunar employees, should report any breaches to the Managing Director.

## 6. CHECKING OUT SUPPLIERS AND PARTNERS: DUE DILIGENCE

Where there is a Significant Bribery Risk you must consult with the Managing Director in relation to appropriate anti-bribery compliance measures before:

- Appointing a new supplier;
- Entering into a partnership;
- Entering into a new contract/or amending the terms of an existing contract

A Significant Bribery Risk will arise if: -

- The services involve business partners paying fees, taxes or payments on behalf of Lunar in relation to the import or export of goods;
- The services involve business partners obtaining official permits, permissions or agreement from public officials or agencies; or
- There are any particular reasons to suspect that the risk of corruption or bribery is higher than normal.

The Managing Director will advise on the level of due diligence required and the form of any anti-bribery clauses required in relation to an agreement or contract. Any due diligence must be completed before:

The contract with supplier is signed or renewed;

If the companies cannot agree on whether due diligence is required or the due diligence to be undertaken, then the matter must be referred for determination to the Managing Director.

## 7. GIFTS, HOSPITALITY AND ENTERTAINMENT

All Lunar employees are expected to conduct themselves with integrity, impartiality and honesty at all times. Accordingly, all employees are required to follow these rules on Gifts, Hospitality and Entertainment.

You must maintain a high standard of professionalism and not open yourself up to suspicion of dishonesty or put yourself in a position of conflict between your work and your private interests. Gifts and entertainment given and received as a reward, inducement or encouragement for preferential treatment or inappropriate or dishonest conduct are strictly prohibited. In particular, no gifts, hospitality or entertainment may be given or accepted during a tender process or during contractual negotiations if there is any realistic risk that such gifts or entertainment could influence the outcome of such processes or negotiations.

It is important that all Lunar employees' actions are able to withstand scrutiny, and not cause any embarrassment to the Company, themselves or any third party, including contractors or suppliers.

### Receiving and Giving Gifts

You may accept low value token gifts such as branded pens, stationery and mouse mats produced for the purpose of being given away, if given by an existing supplier. Occasional boxes of confectionary, etc, may be given to a department as opposed to an individual. Otherwise you must refuse personal gifts such as Christmas, wedding or birthday gifts, including vouchers or cash equivalents, received from franchise partners, suppliers, clients and other third parties.

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Any gifts offered must be acceptable within the policy of the receiver’s company/organisation and if you are in any doubts about acceptability no gift should be provided.

**Hospitality/Entertainment**

Lunar employees may occasionally receive invitations from suppliers or others to corporate hospitality or entertainment events.

Hospitality or entertainment may only be accepted if: -

- Employees or personnel from the supplier are in attendance;
- The supplier does not pay any accommodation or (more than trivial) travel expenses for Lunar employees;
- The entertainment and/or acceptance of it could not be interpreted as a reward, inducement or encouragement for a favour or preferential treatment; and it is not unduly lavish or extravagant.

Reciprocal hospitality may be offered but needs to be approved by the Managing Director.

**8. POLITICAL AND CHARITABLE CONTRIBUTIONS**

Lunar does not make contributions or donations to political organisations or independent candidates, nor does it incur any political expenditure.

We respect the right of individual employees to make personal contributions, provided they are not made in any way to obtain advantage in a business transaction.

**9. SPEAKING UP – REPORTING BRIBERY**

Lunar aims to conduct business with the highest standards of ethics, honesty and integrity, and recognises that you have an important role to play in maintaining this aim. Any employee concerned about any form of malpractice, improper action, or wrongdoing by the Company, its employees or other stakeholders are strongly encouraged to report the matter to the Managing Director.

We believe it is essential to create an environment in which you feel able to raise any matters of genuine concern internally without fear of disciplinary action being taken against you, that you will be taken seriously, and that the matters will be investigated appropriately and as far as practicable be kept confidential.

Lunar believes that any employee with knowledge of bribery in any form should not remain silent. We take all matters of malpractice, improper action or wrongdoing very seriously and you are strongly encouraged to raise incidents or behaviours that are not in accordance with the policy, by following the procedure set out below: -

**10. IF IN DOUBT/ADVICE**

If you have any questions you should contact the Managing Director.

Please ensure that you keep up to date with communications and updates.

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