

Anti-Bribery and Corruption Policy Statement

It is our policy to conduct all our business in an honest and ethical manner. The anti-bribery and corruption compliance function is independent and reports directly to the Board from whom it gets its authority. **Espria** takes a zero-tolerance approach to Bribery and Corruption and is committed to acting professionally, fairly and with integrity in all our business dealings and relationships wherever we operate and implementing and enforcing effective systems to counter bribery.

We will uphold all laws relevant to countering bribery and corruption in all the jurisdictions in which we operate.

The Company is committed to:

- ensuring that all employees and partner organisations fully support the prohibition of bribery and corruption.
- ensuring that that our suppliers, partners and customers all suppliers and partners to work towards and uphold similar ethical and moral standards;
- ensuring that the anti-bribery management system, including policy and objectives, is established, implemented, maintained and reviewed to adequately address the organization's bribery risks;
- ensuring the integration of the anti-bribery management system requirements into the organization's processes;
- deploying adequate and appropriate resources for the effective operation of the anti-bribery management system;
- communicating internally and externally regarding the anti-bribery policy, including the provision of training where appropriate and necessary;
- communicating internally the importance of effective anti-bribery management and of conforming to the anti-bribery management system requirements;
- directing and supporting personnel to contribute to the effectiveness of the anti-bribery management system;
- promoting an appropriate anti-bribery culture within the organization;
- promoting continual improvement of the anti-bribery management system by the setting, reviewing and achieving anti-bribery objectives and targets;
- supporting other relevant management roles to demonstrate their leadership in preventing and detecting bribery as it applies to their areas of responsibility;
- encouraging the use of reporting procedures for suspected and actual bribery;
- ensuring that no personnel will suffer retaliation, discrimination or disciplinary action for reports made in good faith, or on the basis of a reasonable belief of violation or suspected violation of the organization's anti-bribery policy, or for refusing to engage in bribery, even if such refusal can result in the organization losing business (except where the individual participated in the violation);
- Any employee or associate person who is found to have acted in contravention of this policy or its principles may be subject to disciplinary action, including summary dismissal where the breach amounts to gross misconduct.

Clinton Groome
COO