

Anti-bribery and Corruption Policy of AllPoints Fibre Networks Limited (APFN)

Version 1

14th February 2024

1. Overview

1.1 Introduction

APFN is committed to fair and honest business practices. We strive to promote and maintain the highest level of ethical standards in relation to all our business activities by implementing and enforcing effective systems to counter the risk of bribery. This Policy is designed to preserve our values.

1.2 Detail

APFN has a zero-tolerance policy towards bribery and corruption.

This Policy applies to any individual or corporate entity a) associated with APFN, b) who APFN performs functions in relation to, for, or on behalf of (such as customers of APFN), and/or c) who performs functions in relation to, for, or on behalf of APFN (such as suppliers of APFN).

You agree to do the following:

- Behave honestly and respect this Policy.
- Use any APFN resources in the best interest of APFN, and do not misuse these resources.
- Make a clear distinction between the interests of our company and our private interests, and avoid possible conflicts of interest; we do not accept gifts, invitations or other advantages which could contradict this principle.
- Ensure that you comply with all applicable legislation including the Bribery Act.
- Commit yourself to this Policy and be continuously conscious about it in an ongoing effort to maintain your and our integrity.
- Promptly report to us any incidents, risks and issues which deviate from this Policy.
- Record all activities and transactions accurately, completely and transparently.
- Follow appropriate due diligence and risk mitigation procedures before proceeding with any contract or other arrangement.

APFN will never:

- Participate in any form of corrupt behaviour.
- Use company funds, in the form of payments or gifts and hospitality for any unlawful, unethical or improper purpose.
- Authorise, make, permit, tolerate or encourage, or invite or accept, any improper payments to obtain, retain or improve business.
- Permit anyone to offer or pay bribes or make facilitation payments on our behalf, or do anything else we would not be permitted to do ourselves.

2. Definition of Corruption and Bribery

Corruption is the misuse of entrusted power for private gains.

Bribery is to offer, receive, promise or give any undue pecuniary or other advantage, whether directly or through intermediaries, in order to obtain or retain business or other improper advantage.

The UK legislation on which this Policy is based is the current Bribery Act and it applies to APFN's conduct both in the UK and abroad.

Facilitation payments are a form of bribery made with the purpose of expediting or facilitating the performance by a public official for a routine governmental action and not to obtain or retain business or any other improper advantage. The facilitation payment is typically demanded by low level and low-income officials to obtain levels of service, one under normal conditions would be entitled to. Facilitation payments are prohibited in most countries. Although this form of bribery may not be currently viewed as a risk, nevertheless APFN has a zero-tolerance Policy regarding facilitation payment.

It is an offence in the UK to:

- a. offer, promise or give a financial or other advantage to another person (i.e. bribe a person), whether within the UK or abroad, with the intention of inducing or rewarding improper conduct; and/or
- b. request, agree to receive or accept a financial or other advantage (i.e. receive a bribe) for or in relation to improper conduct.

You can be held personally liable for any such offence.

It is also an offence in the UK for an employee or an associated person of the company to bribe another person in the course of doing business intending either to obtain or retain business, or to obtain or retain an advantage in the conduct of business, for the company. APFN can also be liable for this offence where it has failed to prevent such bribery by associated persons. As well as an unlimited fine, it could suffer substantial reputational damage.

3. Political and Charitable Contributions and Sponsorships

APFN does not grant financial or other support to political parties or political campaign efforts, as this can be perceived as an attempt to gain an improper business advantage. We encourage our employees to use their personal right to participate in political and democratic processes.

Charity/community support and small donations are acceptable, be it in-kind services, knowledge, services exchange, or direct financial contributions. However, any donations to public sector bodies, politicians (including local politicians), or to any political parties must be disclosed to the board of directors. All associated persons must be careful to ensure that charitable contributions and sponsorships offered or requested, are not used as a subterfuge for and do not constitute bribery. In relation to donations and community support, APFN should consult local stakeholders to unveil relevant needs.

You agree not to do any of the above in this section 3, for or on our behalf, without first advising the board of directors of APFN.

4. Gifts, Hospitality and Expenses

APFN does not offer or receive courtesies which could be evaluated as illegal or improper exchanges.

Courtesies in the form of travel, meals, receptions, gifts or other expenses may only be offered or given to persons with a professional interest in the relationship but not to any spouses and relatives. Courtesies whenever given by you must be documented. The recorded entry must expressly state the nature and purpose of the expenditure, and records must be preserved.

5. General

You agree to report any wrongdoing in line with this Policy to the board of directors of APFN.

Failure to observe this Policy may give rise to a right of termination of our relationship.