

<b>Ethical Standards Policy Statement</b>	<b>SWGR/CPoS/007</b>
	<b>Issue 12, January 2025</b>
<b>Applicability: SWGR Group</b>	<b>Page 1 of 1</b>

Bribery and corruption is, unfortunately, a feature of public and corporate life. SWGR therefore has a clear policy on anti-bribery and corruption to support our employees to make decisions in line with our values.

Our ethical conduct is based on our commitment to acting professionally, fairly and with integrity. SWGR does not tolerate any form of bribery and corruption.

This sets out SWGR's policy on our ethical responsibility and is supported by a procedure, which details further how we achieve this and is maintained within the management system, which can be viewed or requested.

The purpose of this policy is to set out the responsibilities of SWGR employees in observing and upholding our values with respect to bribery and corruption. The policy applies to all SWGR employees (permanent, temporary, volunteers and contractors). It also extends to all our representatives in the countries where we operate. Where we have a minority interest, we will encourage the application of this policy among our partners.

In all aspects of our responsibilities we work closely with our external stakeholders, clients, suppliers and sub-contractors to ensure ethical working is achieved at all times.

In particular our procedures detail how we will deal with:-

- Bribery, as underpinned by the UK Bribery Act of 2010
- Conflicts of Interest
- Gifts and Hospitality
- Payments Under Duress
- Child Labour
- Modern Slavery Act 2015
- General Data Protection Regulations (GDPR 2021)

**Signed:**



**Raj Sinha**  
**Group Managing Director**