



OBAN GROUP 2023

BUSINESS ETHICS POLICY

POLICY STATEMENT

This company is committed to ensuring that all aspects of its business and operations are carried out in a fair, honest and ethical manner at all times, and will strive to ensure that all persons working for the company maintain highest standards of business practice by acting fairly and with integrity in all business dealings and relationships, and by not engaging in any practice that may be designed to influence persons to act dishonestly in the performance or discharge of their duty.

AIMS AND OBJECTIVES

We will ensure that all persons engaged by the company (including any consultants, contractors or service providers) are instructed in the company's position regarding bribery and malpractice in business dealings, and that the company will not:

- make contributions of any kind with the purpose of gaining any commercial advantage
- provide gifts or hospitality with the intention of persuading anyone to act improperly, or to influence a public official in the performance of their duties, or
- make or accept 'kickbacks' of any kind.

This policy does not prohibit giving and receiving promotional gifts of low value, or normal or appropriate hospitality.

RESPONSIBILITIES

The company will:

- keep appropriate internal records that will evidence the business reason for making any payments to third parties
- encourage employees to raise concerns about any issue or suspicion of malpractice at the earliest possible stage, and
- ensure that anyone raising a concern about bribery does not suffer any detriment as a result (even if they turn out to be mistaken).

Persons working for the company (in any capacity) must not:

- accept any financial or other reward from any person in return for providing some favour
- request a financial or other reward from any person in return for providing some favour
- offer any financial or other reward from any person in return for providing some favour.

AUTHORISED BY

Signed: _____

A handwritten signature in black ink that reads "David English".

Date: _____

14/04/2023