



Summit Timber Group Ltd : Anti-Bribery and Corruption Policy

1. Policy Statement

Summit Timber Group Ltd (“the Group”) is committed to conducting all business activities ethically, transparently, and with the highest standards of integrity. The Group adopts a **zero-tolerance approach** to bribery and corruption in all forms and in all jurisdictions in which it operates.

This policy is designed to ensure compliance with the **Bribery Act 2010** and to provide clear guidance to employees and business partners on acceptable conduct.

2. What Is Bribery and Corruption

Bribery is the offering, promising, giving, requesting, or accepting of any financial or other advantage in order to improperly influence a decision, gain a business advantage, or induce someone to act dishonestly.

Corruption includes bribery and any other abuse of entrusted power for private gain.

3. Scope

This policy applies to all individuals working for or on behalf of the Group, including:

- Employees at all levels
- Directors and officers
- Temporary staff, agency workers, and contractors
- Consultants, intermediaries, agents, and representatives

Everyone covered by this policy is required to comply with its principles at all times.

4. Prohibited Conduct

The following behaviours are strictly prohibited:

- Requesting, accepting, offering, or giving any bribe or improper advantage
- Accepting or providing gifts, hospitality, or entertainment that could influence or be perceived to influence business decisions
- Offering financial or other rewards to obtain or retain business or gain a commercial advantage
- Misusing confidential or Company information for personal or commercial gain
- Making direct or indirect political donations or contributions to political parties, organisations, or individuals on behalf of the Group
- Using charitable donations or sponsorships as a means to conceal or facilitate bribery
- Allowing third parties to engage in bribery on the Group’s behalf



Genuine and proportionate hospitality or promotional expenditure may be acceptable where it is reasonable, transparent, and not intended to influence a business decision.

5. Responsibilities

Employees and Representatives

All individuals covered by this policy must:

- Act honestly and with integrity at all times
- Avoid situations that could lead to actual or perceived bribery or corruption
- Be vigilant and report any concerns or suspicions promptly
- Complete any required training related to this policy

Management

The Summit Timber Group Board of Directors, and each Operating Company Managing Director are responsible for:

- Demonstrating visible commitment to this policy
 - Ensuring employees receive appropriate training and guidance
 - Maintaining effective controls to prevent bribery and corruption
 - Investigating suspected breaches promptly and fairly
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6. Gifts, Hospitality and Expenses

Any gifts or hospitality must be:

- Reasonable, proportionate, and appropriate
 - Given openly and transparently
 - Recorded in accordance with Group procedures
 - Not intended to influence, or appear to influence, business decisions
 - Cash gifts or equivalents (such as vouchers) are never permitted.
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7. Reporting Concerns

- The Group encourages employees and business partners to raise concerns about suspected bribery or corruption without fear of retaliation. Concerns should be reported to line management or through the Group's Whistleblowing Policy. All reports will be treated seriously, confidentially, and investigated appropriately.
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8. Investigations and Disciplinary Action

Any allegation of bribery or corruption will be fully investigated. Where wrongdoing is identified:

- Disciplinary action may be taken, up to and including dismissal for gross misconduct
 - The Group will cooperate fully with law enforcement and regulatory authorities
 - Business relationships may be terminated where third parties are involved
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9. Training and Awareness

The Group provides training to ensure employees understand:

- What constitutes bribery and corruption
- How to identify and avoid bribery risks
- Their responsibilities under this policy

Training forms part of induction and ongoing compliance programmes.

10. Monitoring and Review

This policy is reviewed regularly to ensure it remains effective and compliant with legal and regulatory requirements. Continuous improvement measures will be implemented where necessary.

11. Approval

This Anti-Bribery and Corruption Policy has been approved by the Board of Directors of Summit Timber Group Ltd.