

## General Statement

Merlin Flex Ltd is committed to conduct all of its business in an honest and ethical manner. We take a zero-tolerance approach to bribery and corruption and are committed to acting professionally, fairly and with integrity in all our dealings wherever we operate. We are also committed to implementing and enforcing effective systems to counter bribery.

This policy applies to all individuals working at all levels throughout the organisation, including directors, senior managers, employees (whether permanent, fixed-term or temporary), consultants, contractors, and any other person providing services to us.

A bribe is a financial or other advantage offered or given to anyone to persuade them to or reward them for performing their duties improperly or; any public official with the intention of influencing the official in the performance of his duties.

This policy does not prohibit giving and receiving promotional gifts of low value and normal and appropriate hospitality. However, in certain circumstances gifts and hospitality may amount to bribery and all employees must comply strictly with Merlin Flex's ethics policy in respect of gifts and hospitality. We will not provide gifts or hospitality with the intention of persuading anyone to act improperly or to influence a public official in the performance of his duties.

Merlin Flex do not make contributions of any kind to political parties. No charitable donations will be made for the purpose of gaining any commercial advantage.

Merlin Flex will keep financial records and have appropriate internal controls in place which will evidence the business reason for making any payments to third parties. All expense claims relating to hospitality, gifts or expenses incurred to third parties must be submitted in accordance with our expenses policy and specifically record the reason for the expenditure.

All Employees will be encouraged to raise concerns about any issue or suspicion of malpractice at the earliest possible stage. No employee will suffer any detriment as a result of raising genuine concerns about bribery.

The management team is committed to this policy and will review it on an annual basis to ensure it remains appropriate to the business.

Signed.

A handwritten signature in purple ink, appearing to read "M Merifield", written over a light blue circular stamp.

Mark Merifield (Managing Director)

Date: 6<sup>th</sup> July 2021

<b>Change History</b>			
Change Number	Description of change(s)	Initial	Date
1	Change History added	MM	28/09/2020
2	Updated with digital signature & new logo	MM	06/07/2021