



Relay Global Anti-Bribery Policy

1. Introduction

Relay Global values its reputation for ethical behaviour, financial integrity, and reliability. We recognise that involvement in bribery not only constitutes a criminal offence but also damages our reputation and stakeholder trust.

Our aim is to limit exposure to bribery by:

- Setting out a clear anti-bribery policy.
- Establishing and implementing appropriate procedures.
- Communicating this policy to employees and to relevant third parties, including service providers, agents, and other business partners, where appropriate.
- Conducting due diligence before engaging representatives.
- Monitoring and reviewing bribery risks and the effectiveness of controls.

2. Policy Statement

Relay Global strictly prohibits bribery in any form:

- To or from any person or organisation, whether public or private, domestic or international.
- By any employee, agent, or representative acting on behalf of Relay Global.
- Intended to gain commercial, contractual, or regulatory advantage through unethical means.
- Intended to secure personal gain for the individual or their associates.

This includes any inducement that results in personal benefit and influences decisions not solely in the interest of Relay Global or the party represented.

Note: This policy does not prohibit customary hospitality or gifts given during festivals or special occasions, provided they are proportionate, culturally appropriate, and properly recorded.

If there is any doubt about whether an action may constitute bribery, employees must seek guidance from a Director before proceeding.

3. Employee Responsibilities

All employees share responsibility for preventing, detecting, and reporting bribery. Relay Global is committed to:

- Encouraging vigilance and the reporting of any suspicions.
- Providing secure and confidential communication channels.
- Ensuring sensitive information is handled appropriately.
- Investigating allegations and cooperating with authorities.
- Taking disciplinary action against individuals involved in bribery.





Any suspicion of bribery must be reported in confidence to the **Managing Director**, who holds overall responsibility for bribery prevention.

