



Corporate Governance

Group Anti-Bribery and Corruption policy

Owner	Group General Counsel & Company Secretary
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Version	5

INTRODUCTION

Our ability to operate and our reputation in our markets are based on the foundations of sound and fair business practices. As such, we take a zero-tolerance approach to bribery and corruption, wherever and in whatever form that it may be encountered. In addition, the perception of, or association with, any corrupt activity is potentially damaging to the business and therefore we must ensure that our business processes, activities, and partnerships are free from bribery and corruption.

This policy sets out the standards that all employees must uphold to ensure that we are compliant with all legal obligations, including those under the UK's Bribery Act 2010. The Bribery Act applies to SIG plc and all of its affiliate companies, wherever they are incorporated or established.

This Policy applies to all employees across the Group as well as contractors, agents, consultants or any others working for, or on behalf of, SIG. All such persons should ensure that they are also aware of and familiar with any local legislation in relation to Anti-Bribery and Corruption.

In this document 'SIG' refers to SIG plc and its affiliate companies. 'Our' and 'we' refers to SIG plc.

PRINCIPLES OF ANTI-BRIBERY AND CORRUPTION

Bribery is the offering, promising, giving, accepting or soliciting of an advantage as an inducement for an action which is illegal or a breach of trust. A bribe does not necessarily need to involve money. It can be any form of advantage offered, requested or received. Similarly, a recipient does not need to benefit personally from a bribe; it may be that the intended beneficiary is a third party or a company.

Corruption is the misuse of power for gain. A contract does not need to have been won for a corruption offence to have been committed.

If there is ever uncertainty as to what constitutes a bribe or whether an action may constitute corruption, the matter should be referred to the relevant line manager before proceeding.

Employees **must never**:

- offer, promise or pay bribes
- request, agree to or accept bribes
- participate in any activity that uses a position of power within the business for personal gain
- participate in any activity that provides any promise of, or actual, personal gain in relation to any individual, external to the business, in conflict with the interests of the Group.

No employee will suffer penalty or other adverse consequences for refusing to pay bribes, even if such refusal results in SIG losing business.

GIFTS AND HOSPITALITY

Gifts and hospitality can also amount to, or give the perception of, bribery. Special care must be taken if you are offered a gift or any hospitality. Any offers that may be disproportionate or unreasonable may be done so with a specific intention, and it is important to remain vigilant to any real or perceived actions of bribery. Further guidance can be found in the [Group Gifts & Hospitality Policy](#).

FACILITATION PAYMENTS

'Facilitation payments' are unofficial payments for routine governmental action, for example, the issuing of permits or actions that expedite processes or duties, which officials are already bound to perform. This should be contrasted with recognised "fast track" processes available to all on payment of an official fee.

Under no circumstances should any payments be offered, which may be a real or perceived facilitation payment.

If there is doubt as to the validity of an official's request for a payment, the steps below should be followed as far as they are applicable and as far as it is possible to do so without putting anyone's personal safety or security at risk:

- make a full note of the request, the circumstances and the parties involved
- if possible contact your line manager or supervisor immediately
- ask the official for proof of the validity of the fee

- request that a receipt/invoice is provided confirming the validity of the payment
- if no proof of validity will be provided, politely decline to make payment and explain that this is due to company policy and anti-bribery laws
- if possible ask to see the official's supervisor
- at all times remain calm, respectful and polite

Inevitably, decisions as to what is acceptable may not always be easy. If there is ever uncertainty as to facilitation payments, or the steps that should be taken, the matter should be referred to the relevant line manager before proceeding.

RESPONSIBILITIES

Our aim is to limit our exposure to bribery and corruption by:

- providing clear guidance to employees on our standards and expectations
- training all employees so that they can recognise and avoid the use of bribery by themselves and others
- encouraging employees to be vigilant and to report any suspicion of bribery, providing them with suitable channels of communication and ensuring sensitive information is treated appropriately
- rigorously investigating instances of alleged bribery and assisting the police and other appropriate authorities in any resulting prosecution
- taking firm and vigorous action against any individual(s) involved in bribery or corruption

Employee responsibilities

As an employee, you must be vigilant in order to prevent, detect and report anything that you may think constitutes bribery or corruption.

Employees who are found to be in breach of this Policy will be subject to disciplinary procedures up to and including dismissal from the Company.

If you have any concerns, you should raise this with your line manager, supervisor or your local HR team in the first instance. Alternatively, the Group operates a Whistleblowing Policy and procedure, which allows you to raise any concerns to senior management or via our external partner confidentially and/or anonymously. Any employee raising genuine concerns about unethical behaviours or practices can do so without fear of any reprisal, discrimination or victimisation.

Please see the [Group Whistleblowing Policy](#) for further information.

Management responsibilities

If you are a manager, you must drive and ensure compliance with this policy in your teams. You must ensure that your team is aware of their obligations in relation to bribery and corruption, and that any instances, reports or concerns of bribery and corruption are reported immediately through the relevant channels.

IMPLEMENTATION

The Chief Executive Officer has lead responsibility for the implementation of this policy within the SIG Group. However, it is the responsibility of each SIG employee and third-party to comply with this Policy.

The Group General Counsel & Company Secretary is responsible for maintaining and reviewing this policy, and for clarifying and resolving general issues. Audits of policy compliance may be undertaken on a periodic basis, as deemed appropriate.

FURTHER GUIDANCE AND SUPPORT

If you have any questions on the content of this policy, or for further guidance or support, please contact the Group General Counsel & Company Secretary via email at cosec@sigplc.com.

Further information can also be found in the following related Policies:

- [Group Gifts and Hospitality Policy](#)
- [Group Whistleblowing Policy](#)
- [SIG Code of Conduct](#)

Pim Vervaat
Chief Executive Officer
SIG plc



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