



ANTI-BRIBERY POLICY

Management of **GLOBE WILLIAMS** recognises the risks of bribery and has all the resources needed to combat it in all company sectors and activities.

Management of **GLOBE WILLIAMS** across the entire range of company operations:

- prohibits any form of bribery or the acceptance of bribes;
- requires that all employees comply with the laws of the state or EU on bribery which apply to the company;
- urges the involvement of all employees in identifying and recognising the signs of any possible bribery and prohibits punishment or negative treatment of such employees;
- undertakes to implement measures and provide the necessary resources to combat bribery;
- raises awareness and suitably trains its staff via continuous updates and training about how to combat bribery;
- has put in place a specific anti-bribery unit which is independent of other staff, reports only to the CEO and is obliged and empowered to investigate all possible cases of bribery, to examine and evaluate the risks of bribery and to implement measures to combat it.
- If there is bribery, sanctions are imposed and in the case of breach of the relevant legislative requirements, a complaint is made to the competent authorities.

Compliance with this policy is mandatory and binding on all company staff and associates.

This text is available to all staff, clients, associates, company suppliers and all public and municipal authorities involved.

If you have any concerns or any complaints you may contact our Anti-Bribery System Officer by email at: info@globewilliams.com

On behalf of Management