



ANTI-BRIBERY & CORRUPTION POLICY

Definition

Bribery is, in the conduct of the Company's business, the offering or accepting of any gift, loan, payment, reward or advantage for personal gain as an encouragement to do something which is dishonest, illegal or a breach of trust.

Bribery is a criminal offence. The Company prohibits any form of bribery. We require compliance, from everyone connected with our business, with the highest ethical standards and anti-bribery laws applicable. Integrity and transparency are of utmost importance to us, and we have a zero-tolerance attitude towards corrupt activities of any kind, whether committed by Stackright employees or by third parties acting for or on behalf of Stackright.

Purpose

The purpose of this policy is to convey to all employees and interested parties of Stackright the rules of the Company in relation to our unequivocal stance towards the eradication of bribery and our commitment to ensuring that Stackright conducts its business in a fair, professional and legal manner.

Offences

It is a criminal offence to:

- offer a bribe or accept a bribe
- bribe a foreign official or as a commercial organisation, to fail to prevent a bribe

You should be aware that if you are found guilty by a court of committing bribery, you could face up to 10 years in prison and/or an unlimited fine. The Company could also face prosecution and be liable to pay a fine.

Definitions of bribery and corruption

Corruption is the misuse of office or power for private gain. Bribery is a form of corruption which means in the course of business giving or receiving money, gifts, meals, entertainment or anything else of value as an inducement to a person to do something which is dishonest or illegal.

Scope

This policy applies to all employees of Stackright, regardless of seniority or site. It also extends to anyone working for or on our behalf e.g. those engaged by us on a self-employed basis or an agency arrangement.

We will encourage the application of this policy where our business involves the use of third parties e.g. suppliers; contractors.

Policy

It is prohibited, directly or indirectly, to offer, give, request or accept any bribe i.e. gift, loan, payment, reward or advantage, either in cash or any other form of inducement, to or from any person or company in order to gain commercial, contractual or regulatory advantage for the Company, or in No gift should be given nor hospitality offered by an employee or anyone working on our behalf to any party in connection with our business without receiving prior written approval from Antonio Pontiero, Managing Director. Similarly, no gift nor offer of hospitality should be accepted by an employee or anyone working on our behalf without receiving prior written approval from Antonio Pontiero, Managing Director.

A record will be made of every instance in which gifts or hospitality are given or received.

As the law is constantly changing, this policy is subject to review and the Company reserves the right to amend this policy without prior notice.

Signed:

A handwritten signature in black ink, appearing to be 'AP', with a stylized flourish at the end.

Position: Managing Director

Date: December 2021