



Anti-bribery & Corruption Policy

Trueline is committed to the highest standards of integrity and conduct and adopts a zero-tolerance approach to bribery and corruption. This applies to both employees and anyone acting on Trueline's behalf. This policy sets out the standards expected of all Trueline employees in relation to bribery and corruption by clearly stating the responsibilities upon those working for and with us. It provides guidance on how to avoid, recognise and tackle any issues.

This policy is also relevant for third parties who undertake services on our behalf. Trueline expects those third parties to abide by this policy or have equivalent policies in place that combat bribery and corruption. Trueline takes its responsibilities seriously due to the significant risks that non-compliance brings should employees or service providers fail to comply.

Bribery

A bribe is any financial or other type of advantage offered, promised or given from one person to another in order to gain commercial, contractual, regulatory or personal advantage. Bribes are not just monetary, they can be any type of gift, hospitality or inducement. A contract or transaction does not need to happen or be completed for bribery to have taken place. To comply with this policy:

- Do not offer, promise or pay/provide bribes
- Do not accept, request or agree to bribes

Gifts, hospitality and entertainment

This policy does not prohibit normal and appropriate gifts, entertainment and hospitality, both received and given, from and to third parties. Routine and inexpensive activities such as business breakfasts/lunches and small items of promotional material such as Trueline branded marketing items remain appropriate to what we do. However, any other type of gifts, hospitality or entertainment is subject to the following rules:

- they are appropriate to the circumstances and there is no risk that they could be perceived as improperly influencing the recipient
- they are for the purpose of establishing or maintaining good and ethical business relationships
- they improve the image or reputation of Trueline and is arranged in good faith
- any gifts hospitality or entertainment is not offered promised or accepted to secure an advantage for the company or any of its employees, or to influence the impartiality of the recipient

Intermediaries. Suppliers and Service Providers

Employees of Trueline exercise due diligence to prevent bribes being offered or given by intermediaries, suppliers or service providers. Third parties are expected to abide to a similar zero tolerance approach to bribery and corruption. Agreements entered into should provide for their termination in the event of actual or perceived corruption or bribery by the third party with any concerns immediately being raised with managers

Conflicts of Interest

This is a situation in which personal interest of an employee or representative conflicts with the interests of the business. It can be financial, professional, family or other interests. Please report any such conflicts, or perceived possible conflicts, to your manager so they can support you in managing the situation.

Responsibilities

Trueline employees will notify their manager of any concerns regarding compliance with this policy. Those persons will be investigated in a manner that reflects Trueline's zero tolerance position to bribery and corruption. No persons raising such concerns will be subject to unfavourable treatment or disciplinary action.

A handwritten signature in blue ink, consisting of a large, stylized initial 'S' followed by a long horizontal line extending to the right.

Steven Mares

Managing Director