

### **Anti-Corruption and Bribery Policy**

Geolorn Ltd. is committed to applying the highest standards of ethical conduct and integrity in our business activities. Every employee and individual acting on Geolorn Ltd.'s behalf is responsible for conducting company business honestly and professionally. Geolorn Ltd. benefits from carrying out business in a transparent and ethical way and by helping to ensure that there is honest, open and fair competition in our sectors.

Geolorn Ltd. does not tolerate any form of bribery by, or of, its employees or any persons or companies acting for it or on its behalf. The senior management are committed to implementing and enforcing effective systems to prevent, monitor and eliminate bribery, in accordance with International Bribery Law's. Geolorn Ltd. has issued an Anti-Bribery Policy, the Anti-Bribery policy applies to all employees and they are required to familiarise themselves and comply with the policy. A bribe is a financial advantage or other reward that is offered to, given to, or received by an individual or company (whether directly or indirectly) to induce or influence that individual or company to perform public or corporate functions or duties improperly.

Employees and others acting for or on behalf of Geolorn Ltd. are strictly prohibited from making, soliciting or receiving any bribes or unauthorised payments. As part of its anti-bribery measures, Geolorn Ltd. is committed to engage only in transparent, proportionate, reasonable and bona fide hospitality and promotional expenditure. Geolorn Ltd. will not conduct business with service providers, agents or representatives that do not support Geolorn Ltd.'s anti-bribery objectives. The success of Geolorn Ltd.'s anti-bribery measures depends on everyone playing their part in helping to detect and eradicate bribery. Therefore, all employees and others acting for, or on behalf of, Geolorn Ltd. personnel are encouraged to report any suspicious activity to the Geolorn Ltd. Board who will support any individuals who make such a report in good faith.



**Kevin J Mallin**  
**Managing Director**