Anti-Bribery and Corruption Policy Statement

Commitment to Ethical Business Practices

Espria is firmly dedicated to upholding the highest standards of ethics and transparency throughout all its business operations. Through this Anti-Bribery and Corruption Policy Statement, the company affirms its unwavering commitment to the prevention of bribery and corruption at every level of its activities. Espria recognises that bribery and corruption are not only illegal and unethical, but also fundamentally opposed to the core values that define the organisation.

Compliance with this policy is mandatory for all employees, contractors, and business partners acting on behalf of Espria. Every individual and organisation associated with Espria is expected to fully support and adhere to the requirements set out in this policy.

Governance and Oversight

The anti-bribery and corruption compliance function at Espria operates independently, reporting directly to the Board of Directors. This governance structure ensures that the compliance function retains the necessary authority and autonomy to oversee adherence to the policy and to escalate issues when necessary.

Zero-Tolerance Approach

Espria enforces a strict zero-tolerance stance towards bribery and corruption. The organisation is committed to conducting itself professionally, fairly, and with integrity in all business dealings and relationships, regardless of location. To achieve this, robust systems and controls are implemented and maintained to prevent, detect, and address bribery and corruption in all their forms.

Scope and Application

This policy applies to all employees, officers, directors, associates, and third parties acting on behalf of Espria, irrespective of their location or role within the organisation. It covers all activities, including but not limited to, interactions with public officials, business partners, and private individuals, and it extends to every region and jurisdiction where Espria operates.

Definitions

- Bribery: The offer, promise, giving, acceptance, or solicitation of an advantage as an inducement for any action that is illegal, unethical, or a breach of trust.
- Corruption: The abuse of entrusted power for private gain.

Examples of bribery and corruption can include cash payments, gifts, hospitality, and facilitation payments intended to influence business outcomes.

Company Commitments

Espria is committed to the following actions:

- Complying with all applicable anti-bribery and anti-corruption laws and regulations, including but not limited to the UK Bribery Act 2010 and the US Foreign Corrupt Practices Act (FCPA).
- Ensuring that all employees and partner organisations fully support the prohibition of bribery and corruption.
- Regularly assessing bribery and corruption risks within the business and taking steps to mitigate them. All third parties, such as agents, consultants, and suppliers, are subject to due diligence and ongoing monitoring to ensure compliance with Espria's anti-bribery standards.
- Establishing, implementing, maintaining, and reviewing the anti-bribery management system, including policy and objectives, to adequately address the organisation's bribery risks.
- Integrating anti-bribery management system requirements into organisational processes.

- Deploying adequate and appropriate resources for the effective operation of the anti-bribery management system.
- Providing regular anti-bribery and corruption training to all personnel and relevant third parties to ensure awareness of their responsibilities, including provision of training where appropriate and necessary.
- Communicating internally the importance of effective anti-bribery management and compliance with the anti-bribery management system.
- Directing and supporting personnel to contribute to the effectiveness of the anti-bribery management system.
- Promoting an appropriate anti-bribery culture within the organisation.
- Promoting continual improvement of the anti-bribery management system by setting, reviewing, and achieving anti-bribery objectives and targets.
- Supporting other relevant management roles to demonstrate leadership in preventing and detecting bribery as it applies to their areas of responsibility.
- Encouraging the use of reporting procedures for suspected and actual bribery.
- Ensuring that no personnel will suffer retaliation, discrimination, or disciplinary action for reports made in good faith, or on the basis of a reasonable belief of violation or suspected violation of the anti-bribery policy, or for refusing to engage in bribery—even if such refusal results in the loss of business—except where the individual participated in the violation.

Whistleblowing

Establishing and maintaining robust whistleblowing procedures is fundamental to the integrity of the anti-bribery management system. All personnel and relevant third parties are encouraged to report any concerns regarding suspected or actual bribery or corruption through confidential channels. The organisation is committed to ensuring that reports are handled sensitively, investigated thoroughly, and that whistleblowers are protected from any form of retaliation or adverse treatment. This approach fosters a culture of openness and accountability, supporting the continual improvement of our anti-bribery measures.

Enforcement and Review

All reports of suspected bribery or corruption will be promptly and objectively investigated under strict confidentiality. Any employee or associate found to have acted in violation of this policy or its principles may be subject to disciplinary action, including summary dismissal in cases where the breach constitutes gross misconduct.

Espria establishes and regularly reviews quality objectives and targets to achieve these aims. This policy is evaluated on a regular basis to ensure its continued suitability and effectiveness.



Angelo Di Ventura
CEO

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