

Annex D

Anti-Corruption and Anti-Bribery Policy Statement

It is the policy of Sci-Lab Analytical Limited to conduct all of its business in an honest and ethical manner. We take a zero-tolerance approach to bribery and corruption and are committed to acting professionally and with integrity in all our business dealings and relationships wherever we operate.

Sci-Lab Analytical Limited and any person acting on its behalf shall not participate in any form of corrupt behaviour and shall comply with the Bribery Act 2010 and all other laws relevant to countering bribery and corruption.

Who is covered by the policy?

This policy applies to all associated persons of Sci-Lab Analytical Limited.

Associated persons include:

- All employees of Sci-Lab Analytical Limited. This applies to individuals working for Sci-Lab Analytical Limited at all levels and all grades, whether permanent, fixed-term or temporary, and whether in paid employment or acting voluntarily;
- All contractors, sub-contractors, consultants, joint-venture partners, agents, intermediaries and to any other person associated with Sci-Lab Analytical Limited or acting on our behalf, and to all of their employees;
- All directors of Sci-Lab Analytical Limited;
- Sci-Lab Analytical Limited's subsidiaries and their employees.

This policy applies to all dealings you as an associated person have with any individual or organisation you come into contact with during the course of your work with us.

Your responsibilities

You must ensure that you read and understand this policy and all related anti-corruption and anti-bribery policies and procedures, as it is your responsibility to comply with all such policies and procedures at all times. The prevention, detection and reporting of bribery and other forms of corruption are the responsibility of all those working for, or under the control of, Sci-Lab Analytical Limited. All associated persons are required to avoid any activity that might lead to, or suggest, any breach of Sci-Lab Analytical Limited's anti-corruption and anti-bribery policies and procedures.

You must notify the Managing Director as soon as possible if you believe or suspect that a conflict with any of Sci-Lab Analytical Limited's anti-corruption and anti-bribery policies and procedures has occurred, or may occur in the future. For example, if a client or potential client offers you something to gain a business advantage with us, or indicates to you that a gift or payment is required to secure their business this should be reported as soon as possible. Further, "suspicious behaviour" that may indicate bribery or corruption are set out in the Whistleblowing Procedure.

The Company's zero-tolerance approach to bribery and corruption must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and as appropriate thereafter.

Who is responsible for enforcing the policy?

The board of directors has overall responsibility for ensuring this policy complies with the Company's legal and ethical obligations, and that all those under our control comply with it.

The Managing Director has primary and day-to-day responsibility for implementing this policy, and for monitoring its use and effectiveness.

Failure to comply

Bribery and corruption are serious offences. Individuals can be liable to a term of imprisonment for up to 10 years (under the Bribery Act) and be liable to a fine or both. If Sci-Lab Analytical Limited is found to have taken part in corruption it could face an unlimited fine, be excluded from tendering for public contracts and seriously damage the company's reputation. Therefore Sci-Lab Analytical Limited is committed to strictly enforcing this policy. Any failure to comply with this anti-corruption policy or its supporting policies will be fully investigated by the company and appropriate action taken. Any employee who breaches this policy will face disciplinary action, which could result in dismissal for gross misconduct. Breach of this policy by any other associated person may result in Sci-Lab Analytical Limited terminating any contractual relationship.

Record-keeping

Sci-Lab Analytical Limited will keep financial records and internal controls to evidence the business reason for making payments to or receiving payments from third parties. You will cooperate with Sci-Lab Analytical Limited to ensure that all accounts, invoices, memoranda and other documents and records relating to dealings with third parties, such as clients, suppliers and business contacts, are prepared and maintained with strict accuracy and completeness. Under no circumstances shall accounts be kept "off-book" to facilitate or conceal improper payments.

How to raise a concern

You are encouraged to raise concerns about any issue or suspicion of malpractice at the earliest possible stage. If you are unsure whether a particular act constitutes bribery or corruption, or if you have any other queries, these should be raised with your line manager in the first instance or the Managing Director. Concerns can be reported by following the procedure set out in Sci-Lab Analytical Limited's Whistleblowing Policy.

What to do if you are a target of bribery or corruption

It is important that you tell the Managing Director as soon as possible if you are offered a bribe by a third party, are asked to make one, suspect that this may happen in the future, are aware of bribery taking place or believe that you are a victim of any other form of unlawful activity.

Protection

Those who raise concerns or report another's wrongdoing are sometimes worried about possible repercussions. This is particularly the case where the person has refused to accept or offer a bribe. Sci-Lab Analytical Limited aims to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken.

Sci-Lab Analytical Limited is committed to ensuring no one suffers any detrimental treatment as a result of refusing to take part in bribery or corruption, or because of reporting in good faith their suspicion that an actual or potential bribery or other corruption offence has taken place, or may take place in the future. If you believe that you have suffered any such treatment, you should inform the Managing Director immediately.

Monitoring and Review

The Managing Director will monitor the effectiveness and review the implementation of this policy regularly considering its suitability, adequacy and effectiveness. Any improvements identified will be made as soon as possible. Internal control systems and procedures will be subject to regular audits to provide assurance that they are effective in countering bribery and corruption.

All employees, workers and associated persons are responsible for the success of this policy and should ensure they use it to disclose any suspected danger or wrongdoing.

All employees, workers and associated persons are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries should be addressed to the Managing Director.

Conflict Minerals

Sci-Lab Analytical Limited is committed to a socially responsible supply chain. We believe, as far as practically possible, that our materials do not originate from the Democratic Republic of Congo (DRC) or adjoining countries that share an internationally recognised border (covered countries).

Sci-Lab Analytical Limited rarely purchases tin, tantalum, tungsten and gold (3T&G) direct from smelters or mines. With many tiers within the supply chain that isolate us from the smelters and mines where the raw materials are sourced, we are reliant on our suppliers to determine the sources and conflict status of the 3T&G products supplied to us.

Sci-Lab Analytical Limited expects that our suppliers are able to certify, or are in the process of certifying, that the materials they supply originate from "DRC Conflict Free" countries' smelters or mines. We will continue to work with our suppliers to strengthen compliance and ensure that only "DRC Conflict Free" materials are purchased.

Sci-Lab Analytical Limited has no indication that the products we supply have been sourced from conflict mines or smelters in the Democratic Republic of Congo or adjoining countries.

Corrupt Payments

Sci-Lab Analytical Limited prohibits the giving or acceptance of corrupt payments of any kind whatsoever, no matter how small. Demands or requests for such payments should be refused and reported immediately to the Compliance Manager. All workers must avoid any activity that might lead to, or suggest, that a corrupt payment will be made or accepted by Sci-Lab Analytical Limited.

It is also a policy of Sci-Lab Analytical Limited that we work to ensure that our agents and other intermediaries, joint venture partners, contractors and suppliers do not make corrupt payments on our behalf.

This policy applies to all jurisdictions. It includes facilitation payments (or 'grease payments') which are nominal, but unofficial payments made to secure or expedite a routine process which a person is already committed to perform (i.e. payment made to an official to speed up customs clearance or issuing permits). Facilitation payments may be customary in some jurisdictions.

All employees should be mindful that corrupt payments may be described as administration fees, a local tax charge or commission payment. If you are asked to make a payment on behalf of Sci-Lab Analytical Limited, you should consider what the payment is for and whether the amount requested is proportionate for the goods or services being provided. You should always ask for a receipt which details the reason for the payment.

If you have any suspicions, concerns or queries regarding a payment, you should raise these with the Managing Director as soon as possible if practicable, before making any payment.

In extreme cases where a demand for a corrupt payment is made with an immediate threat against your safety or security, then you should make the payment but report the circumstances and the amount of the payment to the Managing Director as soon as possible.

Statement approved and adopted: 01 OCT 2021