

## Visually Connected with Display Manager Ltd

### Anti-Bribery Policy

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- 1. Purpose** - Visually Connected with Display Manager Ltd ("the Company") is committed to conducting all business activities with integrity, honesty, and transparency. This Anti-Bribery Policy establishes the Company's stance against bribery and corruption, ensuring compliance with applicable laws and promoting ethical practices.
- 2. Scope** - This policy applies to all employees, contractors, agents, consultants, and any other parties representing or acting on behalf of Visually Connected with Display Manager Ltd (collectively referred to as "Representatives"). It applies to all jurisdictions where the Company operates.
- 3. Definition of Bribery** - Bribery involves offering, giving, receiving, or soliciting something of value as a means of influencing the actions of an individual in the discharge of their duties. Examples include:
  - Cash payments
  - Gifts, entertainment, or hospitality beyond reasonable limits
  - Kickbacks
  - Favourable treatment or other inducements
- 4. Prohibited Conduct** Representatives must not:
  - Offer, promise, or give bribes to any individual, organization, or public official to gain a business advantage.
  - Solicit, accept, or receive bribes in any form.
  - Engage in activities that could be perceived as bribery or corruption.
- 5. Gifts and Hospitality** Gifts and hospitality are permitted only if they:
  - Are of nominal value and customary within the relevant industry or local culture.
  - Do not create an obligation or expectation of a business advantage.
  - Are transparent and reported in accordance with Company procedures.
- 6. Facilitation Payments** Facilitation payments, also known as "grease payments," are strictly prohibited, even if they are customary in certain regions.
- 7. Responsibilities**
  - **Employees and Representatives:** Must adhere to this policy and report any suspected bribery or corruption.
  - **Managers and Supervisors:** Are responsible for ensuring their teams understand and comply with this policy.
  - **Compliance Officer:** Oversees the implementation and monitoring of this policy and provides guidance on related matters.

- 8. Reporting and Whistleblowing** - Any Representative who suspects or becomes aware of potential bribery or corruption must report it immediately to their manager or the Compliance Officer. Reports can also be made through the Company's whistleblowing hotline or email address. All reports will be treated confidentially, and retaliation against whistleblowers is strictly prohibited.
- 9. Training and Communication** - The Company will provide training to ensure all Representatives understand this policy and their responsibilities. The policy will be communicated to all employees and relevant external parties.
- 10. Record-Keeping** - The Company will maintain accurate records of all financial transactions, gifts, hospitality, and other relevant activities to demonstrate compliance with this policy.
- 11. Consequences of Non-Compliance** - Violation of this policy may result in disciplinary action, including termination of employment or contracts. Violators may also be subject to legal action under applicable anti-bribery and corruption laws.
- 12. Review and Amendments** - This policy will be reviewed annually or as needed to ensure its effectiveness and alignment with legal requirements. Amendments will be communicated to all Representatives.
- 13. Contact Information** - For questions or concerns about this policy, contact the Compliance Officer at paul@displaymanager.net

**Approved by:**

*Lionel Eales*

Lionel Eales - Managing Director, Display Manager Ltd

**Date:** 16/03/2025

**Review Cycle:** Annually