INTEGRITY: ANTI-BRIBERY POLICY

Quantum Controls Ltd is proud of its reputation for ethical behaviour and is committed to the prevention, deterrence and detection of bribery. The Company recognises that corrupt business practices can seriously undermine reputation and shareholder value and pose a serious risk to the longer-term sustainability of business.

Policy

The Company has a zero-tolerance policy towards bribery and corruption.

Quantum Controls Ltd prohibits:

- The offering, giving or receiving of bribes
- The making or acceptance of improper payments to or from:

Any person or company, wherever they are situated and whether they are a public official or body or private person or company by: An individual employee, agent or other person or body acting on behalf of the Company

In order to: obtain or retain business or to secure any improper advantage for the Group in any way which is unethical or to gain any person advantage whatsoever for the individual or anyone connected with them.

Additionally, Quantum Controls Ltd does not make any distinction between facilitation payments and bribes. Any type of facilitation payment is prohibited, large or small – even where these types of payments are perceived as a common part of local business practice or acceptable under local law.

It is the Company's policy that all business decisions are made impartially and fairly, and not on the basis of gratuities. Corporate Hospitality should be used when appropriate, proportionate and properly recorded as set out in the Code of Ethics.

Procedure

The Company seeks to limit its exposure to bribery and corruption practices through:

Setting out a clear anti- bribery policy.

- Training all employees so that they can recognise and avoid the use of bribery by themselves and others
- Encouraging employees to be vigilant and to report any suspicion of bribery, providing them with suitable channels of communication and ensuring sensitive information is treated appropriately
- Rigorously investigating instances of alleged bribery and assisting the police and other appropriate authorities in any resultant prosecution
- Taking firm and vigorous action against any individual(s) involved in bribery
- The prevention, detection and reporting of bribery is the responsibility of all employees throughout the Group.
- Inevitably, it may be difficult to decide what constitutes bribery. If an employee is in any doubt as to whether an act constitutes bribery, he/she should seek the advice of the Managing Director of his/her division or the Group Company Secretary.

- If an employee has suspicion that bribery has taken or is about to take place, he/she can report the incident via the confidential whistleblowing procedure set out in the Code of Ethics. Staff should not attempt to investigate any bribery themselves.

Signed (Managing Director)

9th December 2021

Date of next review:

December 2022