



CORALPOINT ANTI-BRIBERY AND CORRUPTION (ABC) POLICY

1 Purpose and scope

This Anti-Bribery and Corruption (ABC) Policy sets out CoralPoint's commitment to conducting all business honestly, fairly and with integrity, wherever it operates.

- The policy applies across CoralPoint International Limited and its subsidiaries and branch offices, including CoralPoint Ltd (United Kingdom), CoralPoint ApS (Denmark) and CoralPoint USA LLC (United States). It covers all employees, directors, officers, contractors, secondees, agency workers, interns and any other person acting on CoralPoint's behalf, in any country.
- CoralPoint also expects and requires its business partners (including joint-venture partners, introducers, consultants, suppliers and subcontractors) to uphold standards equivalent to those in this policy.

2 Zero tolerance and legal compliance

CoralPoint has a zero-tolerance approach to any form of bribery or corruption, whether involving public officials or private sector counterparties.

- CoralPoint will uphold all applicable anti-bribery and corruption laws in the countries where it operates, including the UK Bribery Act 2010 and laws implementing the OECD Anti-Bribery Convention.
- Any breach of this policy is treated as serious misconduct and may result in disciplinary action up to and including dismissal, as well as termination of contracts with third parties and potential referral to law-enforcement authorities.

3 What is bribery and corruption?

Bribery is the offering, promising, giving, requesting or accepting of a financial or other advantage to induce or reward improper performance of a function or activity.

- Corruption is the abuse of entrusted power for private gain and includes bribery, facilitation payments, kickbacks, bid-rigging, embezzlement, conflicts of interest and other unlawful or unethical practices.
- Bribes can be cash or cash-equivalents, gifts, hospitality, travel, services, employment opportunities, charitable or political contributions, or anything else of value offered with an improper intent.

4 Prohibited conduct

CoralPoint personnel and associated persons must never engage in, authorise, condone or ignore any form of bribery or corruption.

- Do not offer, promise or give a bribe or improper advantage to any person, including a public official, to influence a decision or secure a business advantage.
- Do not request, agree to receive or accept a bribe or improper advantage in connection with CoralPoint's business, including through relatives or third parties.



5 Public officials and facilitation payments

Interactions with public officials carry heightened risk and must be handled with particular care.

- Public officials include any officer or employee of a government, state-owned or state-controlled entity, public international organisation, political party, or candidate for public office.
- Facilitation payments (small, unofficial payments to secure or speed up routine governmental actions) are strictly prohibited, even where such payments may be “customary” locally and regardless of value.

6 Gifts, hospitality and expenses

Reasonable and proportionate gifts, hospitality and promotional expenditure may be permitted where they are transparent, infrequent, of modest value and clearly for legitimate business purposes.

- Never offer or accept gifts, hospitality or expenses that are lavish, frequent, made in cash (or cash-equivalent), or given during sensitive times such as tenders, contract awards or regulatory decisions.
- All gifts and hospitality must be recorded in CoralPoint’s register in line with internal thresholds and pre-approval requirements, and anything involving public officials requires prior written approval from a designated senior manager.

7 Charitable and political contributions

CoralPoint supports responsible and transparent corporate citizenship while avoiding any perception that contributions are used to obtain improper advantages.

- Charitable donations must be transparent, properly documented, made to reputable organisations after basic due diligence, and never linked to the award or retention of business or a regulatory decision.
- CoralPoint does not make political donations on behalf of the firm, and employees must not use company funds, resources or time to support political parties or candidates.

8 Third-party due diligence

CoralPoint recognises that bribery and corruption risks often arise through third parties such as agents, intermediaries and consultants.

- Before engaging any higher-risk third party (for example, business development consultants, lobbyists, local agents, or joint-venture partners), appropriate, risk-based due diligence must be conducted and documented.
- Contracts with such third parties must include clear ABC clauses, including obligations to comply with this policy, provide information on request and allow CoralPoint to terminate the relationship for non-compliance.

9 Record-keeping and controls

Accurate books and records are essential to prevent and detect bribery and corruption.



- All payments and benefits provided or received in the course of business must be fully and accurately recorded in CoralPoint's financial records and supported by appropriate documentation.
- CoralPoint will maintain internal controls, including approvals, segregation of duties and periodic reviews, to help ensure that payments are legitimate and compliant with this policy and applicable laws.

10 Responsibilities and training

ABC is everyone's responsibility; leadership sets the tone but all personnel must act with integrity.

- CoralPoint's senior management will demonstrate visible and consistent commitment to this policy, allocate appropriate resources and review its effectiveness regularly.
- All employees are expected to familiarise themselves with this policy, seek guidance where they are unsure how to apply it, and ensure that their day-to-day decisions and behaviours are consistent with CoralPoint's anti bribery and corruption commitments.

11 Raising concerns (whistleblowing)

CoralPoint encourages employees and third parties to speak up promptly if they know of or suspect any breach of this policy.

- Concerns can be raised with a line manager, the Compliance Officer or a member of the CoralPoint board of directors, or by anyone, including third parties, at speakup@coralpoint.com, as set out in CoralPoint's Speak Up (Whistleblowing) Policy. Concerns may be raised anonymously where permitted by law.
- CoralPoint prohibits retaliation of any kind against anyone who raises a concern honestly and reasonably, or who participates in an investigation, even if the concern turns out to be unfounded.

12 Breach, investigation and remediation

Alleged breaches of this policy will be taken seriously and investigated promptly and impartially.

- CoralPoint may take disciplinary action, contractual remedies and other appropriate steps where violations are substantiated, and will cooperate with competent authorities as required.
- Lessons learned from investigations will inform improvements to CoralPoint's controls, training and risk assessments to strengthen its overall ABC framework.

13 Review and ownership

This policy is owned by CoralPoint's senior management and will be reviewed at least annually and whenever there are significant changes in the business or relevant laws.

- Updates will be communicated to all relevant personnel and business partners, and translated or localised where necessary to ensure understanding across CoralPoint's international operations.
- Questions about the interpretation or application of this policy should be directed to an appropriate line manager, the Compliance Officer or a member of the CoralPoint board of directors.



Approval and Implementation

This Anti-Bribery and Corruption Policy is approved and adopted by CoralPoint with effect from the date below. All employees, contractors, and third parties engaged by CoralPoint are required to comply with this policy.

For and on behalf of CoralPoint International Limited

Signed by:

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Emilie Reeve
Co-CEO,
Barnsgrove, 29 October 2026