

The Upstream group of companies (“Upstream”) insists on ethical and lawful conduct in all of its business relationships. To ensure it conducts business in an ethical and lawful manner Upstream maintains an Anti-Bribery and Corruption Policy. Upstream expects all agents, intermediaries, contractors and anyone else who performs services for any part of the Upstream Group (“Business Partners”) with whom we do business to conduct their business in an ethical and lawful manner. Upstream requires its Business Partners to comply with these Anti Bribery Principles. Failure to do so will prevent Upstream from entering, or lead to us to terminate, the business relationship.

- **Prohibition of Bribery.** You will not make, accept or facilitate (or promise or offer to make, accept or facilitate) any improper monetary or non-monetary payment, gift or other benefit to or from any person, either directly or through any other person.
- **Prohibition of Bribery in Disguise.** You prohibit any conduct that may influence the business conduct or administrative decisions of others in an inappropriate manner, be it through inappropriate hospitality, gifts, donations, or any other benefits to anyone, in cash or any other form. You will allow expenditure on gifts and hospitality only where it is reasonable and proportionate, incurred in good faith and for proper business purposes.
- **Prohibition of Facilitation Payments.** You prohibit payments to make any administrative process happen or speed it up in any unofficial way. If you are asked for any such payments you must refuse and notify Upstream. Under no circumstances must you make and conceal any such payments from us.
- **Compliance with Law.** You prohibit any conduct that would violate any law or regulation applicable to your or Upstream’s operations.
- **Documentation.** You maintain records to demonstrate your compliance with applicable laws and regulations and these principles.
- **Risk Management.** You identify evolving risks you face in relation to bribery and corruption and take steps to manage those risks and prevent conduct that would breach these principles.
- **Communications and processes.** You have communicated standards covering the above principles (as a minimum) in your organisation and have ensured, through training and otherwise, that those working for you know them and know how to apply them. You have in place procedures to detect and prevent any conduct that would risk breaching these principles. You encourage employees to report any concerns they have in relation to potential breaches of these principles without fear of reprisal.
- **Subcontracting.** You require equivalent standards to those set out in this document from any party to whom you are permitted to subcontract any Upstream work.