

Panorama Antennas group anti-corruption policy

The purpose of this policy

Bribery and corruption is part of corporate and public life in many countries across the world. Panorama Antennas LTD stands firmly against such practices in any and every form and has produced this policy in order support our employees, suppliers and other partners to make decisions in line with our stated position.

Our principles of corporate conduct are based on our commitment to acting professionally, fairly and with integrity. Bribery and corrupt practices run counter to these core principles and will not be tolerated in any form.

The purpose of this policy is to set out the responsibilities of our employees, suppliers and other partners in observing and upholding our position on bribery and corruption. In developing this policy we have made reference to the 'Business Principles for Countering Bribery' published by Transparency International.

Scope

This policy applies to our employees, suppliers and other partners and extends to all our business dealings and transactions in all countries in which we or our subsidiaries and associates operate.

Policy

Panorama Antennas does not permit, sanction or engage in bribery or any form of unethical inducement or payment including facilitation payments and 'kickbacks.' All our employees, suppliers and other partners are required to avoid any activities that might lead to, or suggest, a conflict of interest with the business of the Company. Employees must declare and keep a record of hospitality or gifts accepted or offered, which will be subject to managerial review. We do not make direct or indirect contributions to political parties.

We will uphold laws relevant to countering bribery and corruption in all the jurisdictions in which we operate, particularly laws that are directly relevant to specific business practices. The following national and international laws and conventions underpin this policy:

- OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions (1997)
- Foreign Corrupt Practices Act (US)
- OECD Guidelines for Multinational Enterprises – Combating Bribery
- UN Global Compact – Principle 10 (Anti-Corruption)

Responsibilities

The Group Managing Director is the main board director with primary responsibility for implementing this policy and Board of Directors. If any instance of bribery or corruption is identified, we will take remedial steps immediately.

Training and communications

We will communicate this policy and relevant guidance to employees across the Group, through our established internal communication channels. We will also communicate this policy to our suppliers, contractors and business partners and wider stakeholders. Managers, employees and agents will receive relevant training on how to implement this policy in the scope of their employment with the Group.

Raising concerns and seeking guidance

Employees are encouraged to raise concerns about any instance of malpractice at the earliest possible stage through their immediate line manager or directly to the managing director.