



Anti-Bribery and Corruption Policy

1. Introduction

Pure Communications Group is committed to conducting its business activities with the highest standards of ethics, integrity, and transparency. This Anti-Bribery and Corruption (ABC) Policy outlines our commitment to preventing bribery and corruption in all aspects of our business operations.

2. Policy Statement

It is the policy of Pure Communications Group to prohibit all forms of bribery and corruption, both direct and indirect, by employees, representatives, contractors, and any third parties acting on our behalf. We will not tolerate any form of bribery or corruption in our business activities.

3. Compliance with Laws and Regulations

Pure Communications Group will comply with all applicable international and local laws and regulations concerning anti-bribery and corruption, including the Foreign Corrupt Practices Act (FCPA), the UK Bribery Act, and other relevant legislation in our operating jurisdictions.

4. Prohibited Conduct

- Offering, Giving, or Receiving Bribes: Employees and representatives are prohibited from offering, giving, receiving, or soliciting bribes, kickbacks, or any other corrupt payments in any form.
- Facilitation Payments: Facilitation payments, also known as "grease payments," are strictly prohibited. Employees must not make or receive such payments, even if they are customary in a particular region.
- Gifts and Hospitality: While normal and appropriate business hospitality is acceptable, employees must not give or receive gifts, hospitality, or entertainment that could be interpreted as intended to influence business decisions improperly. Hospitality offered by Pure Communications Group employees to our clients or suppliers is subject to approval by senior management.
- Familiarisation "Fam" visits designed to learn about new venues, suppliers and services for business purposes are allowed as long as they are consistent with section 4 of this policy. Attendance at such events is subject to approval in advance by the business and adherence to the separate Fam Trips policy.



5. Third-Party Due Diligence

Pure Communications Group will conduct due diligence on third parties, including suppliers, agents, and business partners, to ensure they adhere to similar anti-bribery and corruption standards.

6. Reporting Mechanism

Employees are encouraged to report any suspected or actual instances of bribery or corruption promptly to either senior management (CEO, FD, Head of Events) or to our Non-Executive director who is known to all employees and is outside of the normal line management structures. Whistleblowers, and no retaliation will be taken against whistleblowers reporting in good faith.

7. Training and Awareness

Pure Communications Group will provide training to employees on anti-bribery and corruption policies and procedures. This includes educating employees on recognizing and preventing bribery and corruption in their daily activities.

9. Consequences of Non-Compliance

Non-compliance with this policy may result in disciplinary action, termination of employment or contractual relationships, and, where appropriate, legal proceedings. Individuals involved in bribery or corruption may be personally liable for their actions.

10. Communication

Pure Communications Group will communicate this Anti-Bribery and Corruption Policy to all employees, contractors, and relevant stakeholders. The policy will be accessible on our company website and included in the Pure Bible.

11. Review and Revision

This Anti-Bribery and Corruption Policy will be reviewed annually and updated as necessary to reflect changes in the business environment, legal requirements, and best practices.

Last review date: February 24