

Hybridan Bribery and Anti-Corruption Policy

Hybridan LLP (“Hybridan”) warrants and undertakes that it is not and has not at any time engaged in any activity, practice or conduct which would constitute an offence under the Bribery Act 2010 or any similar or equivalent legislation in any part of the world.

Hybridan expects all of its agents and suppliers to act at all times in compliance with applicable anti-bribery and corruption laws and regulations.

Neither the LLP nor any of its Associated Persons is or has been the subject of any investigation, enquiry or enforcement proceedings by any governmental, administrative or regulatory body or any customer regarding any offence or alleged offence under the Bribery Act 2010 and no such investigation are threatened or pending and there are no circumstances likely to give rise to any such investigation, enquiry or proceedings.

Hybridan is committed to conducting business in accordance with the highest ethical standards and in full compliance with all applicable anti-bribery and corruption laws and regulations, including the UK Bribery Act.

It is Hybridan’s policy to conduct all business in an open, honest and ethical manner. Hybridan has a zero-tolerance approach to bribery and is dedicated to acting professionally, reasonably, and with dignity in all its business transactions and relationships.

The ‘Anti-Bribery and Corruption Compliance Program’ includes oversight and governance; communication and training; review and preapproval processes; due diligence on third party relationships, business transactions/deals; monitoring and confidential reporting; and financial controls and record-keeping.

Employees who engage in or facilitate bribery, or who fail to comply with all appropriate anti-bribery and corruption laws, regulations, and Hybridan’s anti-bribery and related policies, may be subject to disciplinary action, up to and including termination.

Hybridan reserves the right to terminate immediately any business relationship that violates its high ethical standards and commitment to responsible business practices.