

Global Anti-Bribery and Corruption Policy

All Colleagues, Contingent Workers and Suppliers (excluding Germany)

1. Purpose

To ensure that:

- JM and its employees comply with global anti-bribery and corruption laws such as the UK Bribery Act (UKBA) and the U.S Foreign Corrupt Practices Act (FCPA).
- We conduct our business in accordance with the high ethical standards and values to which we hold ourselves accountable.

2. Definitions

Word	Definition
Bribery	Giving or receiving money or anything else of value with the intention of improperly influencing an act / decision or gaining an improper advantage. Examples can include: <ul style="list-style-type: none"> • Gifts (including cash equivalents, such as gift cards) • Favourable contracts • Hospitality, such as meals, hotel stays, tickets or invitations to sporting or cultural events • Other promotional expenses (such as travel and accommodation expenses) • Favours that are of value to the recipient (such as offers of employment for a directly involved party or a relative of a party) • Free use of company services, facilities or property • Political contributions • Charitable donations
Corruption	The misuse of power for private gain. Corruption can take many forms, such as fraud, extortion, Facilitation Payments or Bribery
Facilitation Payment	Unofficial payments or gifts made to secure or speed-up a public official's performance of a necessary government action or process. These government actions or processes include, but are not limited to, issuing licenses or permits, scheduling inspections and loading / unloading cargo.

3. Policy

- JM does not tolerate bribery or corruption.
- You must not offer or accept bribes. This applies equally to bribery of public and non-public officials.
- You may not use another person or organisation to bribe on JM's behalf.
- You must ensure third parties acting on JM's behalf are informed of JM's zero tolerance approach to bribery / corruption and we hold them to our standards. (Please refer to the Third Party Intermediary Procedure.)
- You must not make Facilitation Payments of any kind, even if they are customary business practice in the country you are in.
- You must not make political contributions using JM funds unless specifically authorised in advance and in writing by the GLT.
- All gifts and hospitality that are provided or received must comply with this policy and the GH&C Policy.
- You must report any suspected or actual acts of bribery / corruption to the Legal team or via the Speak Up process.
- The Ethics and Compliance team within Group Legal will oversee all Speak Ups except where they are conflicted out in which case it will be referred to the General Counsel & Company Secretary or Audit Committee directly as appropriate.

