

ALLEGRO ANTI-BRIBERY POLICY (2018)

Introduction

This document contains Allego's anti-bribery policy, applicable for business conducted in or outside of the United Kingdom (UK) by a British company, a foreign company operating in the UK, a UK citizen, as well as persons holding residents permits for the UK.

A good reputation is a hard won asset which we must protect. Our ability to tender for new business and our relationship with our stakeholders depends a great deal upon the good reputation we have established.

Therefore, this policy is designed to help you understand the relevant legislation applicable in the UK, namely the Bribery Act of 2010, relevant to bribery and corruption.

In addition, this policy introduces the procedures for and designated person responsible for the implementation and monitoring of this policy, the Allego Compliance Officer.

We are committed to this policy and would ask you to show your commitment too by reading it.

I. Anti-Bribery and Corruption

Introduction

In the UK, the US and other jurisdictions in which we operate, it is a criminal offence to offer, promise or provide – or request or accept, a bribe.

Allego operates on a strict no tolerance policy towards bribery in all its forms whether directly or through third parties.

This policy sets out our anti-bribery and corruption rules and what is expected of you and third parties representing or dealing with Allego.

Understanding and recognizing bribery and corruption

Bribery and corruption can occur in many forms; therefore understanding and recognizing these forms when they may occur is a key step in guarding against them.

Bribery is when a person offers, promises or gives a financial (or other) advantage to another person with the intention of inducing or rewarding that person to act improperly.

Corruption is any form of illegal or dishonest behavior, especially by people in positions of power.

Wherever we work in the world – even where bribery may be seen as the norm, we must be clear that we will not participate in or condone any form of bribery in our dealings with the public or private sectors.

Bribes are not always a matter of handing over cash. Gifts, hospitality and entertainment can be bribes if they are intended to influence a business decision.

Even political contributions, charitable donations and sponsorship arrangements can be used as a subterfuge for bribery.

Penalties for engaging in bribery and corruption

Under the UK Bribery Act, companies and individuals found guilty of engaging in bribery or corruption can face punitive fines and even imprisonment.

In addition, the Act includes a specific criminal offence for when a company fails to prevent bribery committed on its behalf.

Therefore we take this responsibility seriously. For this reason we associate only with others whose standards match our own.

A conviction for a bribery or corruption related offence would have severe consequences for our reputation.

A damaged reputation could lead to us being excluded from tender lists or overlooked when bidding or loss of business, all of which could have severe financial consequences for our business.

Preventing bribery

In order to prevent bribery, we must be aware of the forms it could be present in.

Below is an outline of the most common forms of bribery.

i. Facilitation payments are usually small payments (or gifts) made to public officials in order to speed up or 'facilitate' actions the officials are already duty-bound to perform. The UK Bribery Act does not allow for any facilitation payments to be made. The only exception is where a payment is extorted from you. If you feel coerced or where your safety (or that of your family or colleagues) is at risk. Should this situation arise, you make the payment and report it immediately to the Compliance Officer.

ii. Kickbacks and reciprocal agreements or any other form of 'quid pro quo' are never acceptable. We will not participate in cartels, bid-rigging or any form of collusion. We will never accept improper payments to obtain new business, retain existing business, or secure any improper advantage.

iii. Corrupt third parties can include a range of people acting on our behalf such as agents, consultants, contractors or sub-contractors. We wish to work only with those who are committed to our standards and will undertake due diligence to ensure this. We will engage a third party only when there is a clear business rationale for doing so and with an appropriate contract. We will ensure all payments made to and by third parties are properly authorized and recorded.

iv. Excessive gifts and hospitality can be used to exert improper influence on decision makers. We will never offer or accept gifts or hospitality, if we feel it could influence a business decision or give the appearance of doing so.

2. Disciplinary action

Bribery is a criminal offence, which can lead to criminal penalties including imprisonment and fines for both you and Allego.

Therefore, you have a duty to Allego and breaches of the provisions contained in this policy, will result in disciplinary action, up to and including dismissal.

3. Procedure for raising a concern

If you have a concern or know of or suspect a violation of this policy, speak up immediately, by contacting the Compliance Officer. The contact details of the Compliance Officer are posted on the Risk & Compliance page on MyAllego.

All information received will be treated seriously and investigated appropriately.

All suspected or actual breaches of this policy, must be reported by sending an email to the Compliance Officer.

6. Acknowledgement form

The law requires Allego to ensure that all those to whom this policy applies, have read and understood the provisions contained within it.

Therefore, Allego employees and contractors to whom this policy is applicable will be required to sign a form of acknowledgement, whereby they acknowledge having read and understood this policy.

7. Questions

If you have any questions regarding this policy, please contact the appointed Compliance Officer. Contact details can be found on the Risk & Compliance page on MyAllego.

Allego encourages all employees and contractors to seek further guidance or assistance if you feel you need it in any way. Your personal contribution to protecting and enhancing our reputation by complying with this policy is important.

Only by each one of us individually being aware of the law and complying with it, can we ensure the protection and promotion of the good reputation of Allego.