

Anti-Bribery

STATEMENT

Let's be honest, we all like getting presents and receiving tokens of appreciation, however the line between a well-intentioned gift and an inducement or reward for a promise or a corporate advantage is something altogether murkier.

The act of bribery is a criminal offence and is punishable by unlimited fines and possible imprisonment - we therefore take our moral and legal responsibilities very seriously! Across the Park and our Mobile Activities, it is 270 Climbing's policy to conduct all of our business in an honest and ethical manner. We take a zero-tolerance approach to bribery and corruption and are committed to acting professionally, fairly and with integrity in all our business dealings and relationships wherever we operate and implementing and enforcing effective systems to counter bribery.

From time-to-time customers or suppliers may offer members of staff gifts on an individual basis as a demonstration of their gratitude for the fine work done or customary for events/occasions throughout the year (Birthdays, Christmas etc), and this is perfectly legitimate. However, in some contexts such gifts could be construed as an improper inducement to, for instance, reduce costs or accord preferential treatment in the future.

270 Climbing will uphold all laws relevant to countering bribery and corruption (in all the jurisdictions in which we operate). However, we remain bound by the laws of the UK, including the Bribery Act 2010, in respect of our conduct both at home and abroad.

This statement is in accordance with our staff Anti-Corruption & Bribery Policy and Whistleblowing Policy.

GOVERNANCE

- 270 Climbing undertake periodic risk assessments to identify any areas of the business which may be exposed to corruption risk, and to put in place measures to address those risks.
- Follow appropriate internal controls which will evidence the business reason for making payments to others.
- Our zero-tolerance approach to bribery and corruption is communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and as appropriate thereafter.
- Members of staff are encouraged to raise concerns about any issue or suspicion of malpractice at the earliest possible stage to a 270 Director or manager.
- Training on this policy forms part of the induction process for all new members of staff. All existing staff receive relevant training on how to implement and adhere to this policy.
- Members of staff will adhere to not provide, promise or offer or accept, a payment, gift or hospitality with the direct expectation or hope that a business advantage will be received, or to reward a business advantage already given. The reasonable and proportionate entertainment of customers to mark the conclusion of a valuable contract would not fall within this category, provided that the contract was obtained and given in an open and transparent manner and there is no element of impropriety.
- The giving or receipt of gifts or hospitality is not prohibited, if they are not made with the direct intention of influencing or to obtain or retain a business advantage, or to

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reward the provision or retention of a business advantage, or in explicit or implicit exchange for favours or benefits. Where personal gifts are concerned, taking into account the reason for giving them, they are of an appropriate type and value and given at an appropriate time. e.g. Birthdays or Christmas time.

- To apply the test whether the gift or hospitality is reasonable and justifiable. For it to amount to bribery there must be an element of impropriety. If the intention behind the gift is merely to foster good business relations or to promote 270 Climbing in a good light, and the level of the hospitality or gift is proportionate, then it is highly unlikely to amount to bribery. Because of these factors, the kind of reasonable and proportionate hospitality we have traditionally taken part in (whether as hosts or guests), and no doubt will continue to take part in, would not be viewed as bribery.
- Any gifts under the value of £50 offered to a member of staff, may be retained by the member of staff or donated to 270 Climbing's nominated charity.
- Any gifts over the value of £50, offered to a member of staff, may be donated to 270 Climbing's nominated charity.
- Any personal recognition tips or gifts presented to specific members of staff for outstanding service, which are proportional (usually 10% of the offer) and deemed appropriate, are allowed to be retained by the member of staff as bestowed by the donor(s).

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