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Anti-Bribery Policy

Anti-Bribery Policy (ISO 37001:2016)

Hydrogenera is committed to conducting business with integrity and in full compliance with applicable anti-bribery and anti-corruption laws. Our Anti-Bribery Management System is certified to ISO 37001:2016. We operate a zero-tolerance approach to bribery in any form.

Scope

This policy applies to all directors, employees, temporary staff and trainees, and third parties acting on our behalf, including agents, consultants, intermediaries, suppliers and contractors.

Prohibited conduct

- Offering, promising, giving, requesting or accepting any bribe, kickback or undue advantage
- Making or accepting facilitation payments
- Improper gifts, hospitality, donations or sponsorships intended to influence a business decision.
- Concealing or misrepresenting the nature of payments or benefits

Gifts and hospitality

Modest, proportionate and lawful gifts or hospitality may be acceptable if they:

- Are infrequent and reasonable in value
- Are not cash or cash equivalents
- Are not intended to influence a decision or secure an improper advantage
- All gifts and hospitality must be recorded in the gifts and hospitality register and approved in line with company procedures.

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Conflicts of interest

Employees and representatives must avoid situations that create or appear to create a conflict between personal interests and company duties. Any actual or potential conflict must be disclosed promptly to management.

Due diligence on third parties

We conduct proportionate due diligence on agents, distributors, consultants, suppliers and other third parties. Contracts must include appropriate anti-bribery clauses and audit or termination rights where relevant.

Financial controls and record-keeping

All payments and benefits must be accurately recorded in the company's books and records. False, misleading or incomplete entries are strictly prohibited. Payments should be made through approved channels and never in cash unless expressly authorised with documented justification.

Reporting concerns

We provide confidential channels for raising concerns or seeking guidance. Reports can be made in good faith without fear of retaliation. All reports will be assessed and, where appropriate, investigated promptly and impartially.

Investigations and consequences

Breaches of this policy or related procedures may result in disciplinary action up to and including dismissal, termination of contracts with third parties and referral to law enforcement where required.

Training and awareness

Relevant personnel and third parties receive training proportional to their roles and risk exposure. Refresher training is provided periodically and whenever policies or laws change.

Roles and responsibilities

- The Management Board is accountable for setting the tone, providing resources and overseeing effectiveness.
- The Compliance Officer coordinates the Anti-Bribery Management System, monitors controls and reports on performance.
- Managers are responsible for local implementation and ensuring their teams understand and follow this policy.
- All employees and third parties must comply with this policy and report suspected violations.

Monitoring, review and continual improvement

We monitor the effectiveness of our controls through audits, reviews and key performance indicators. The policy and supporting procedures are reviewed at planned intervals and improved continually in line with ISO 37001:2016.