



## Comar Group Ltd

Including

Comar Optics Ltd, Access Expeditions Ltd,  
Grillo Group Ltd, Comar Investments Ltd

### **Anti-bribery and Anti-corruption Policy**

Comar Group are committed to acting ethically and with integrity and transparency in all our business dealings and confirm that in accordance with the high ethical standards operated by the companies and in accordance with the appropriate legislation:

1. No form of corruption or bribery will be tolerated anywhere globally.
2. No payment or benefit may be made to any foreign or local government official to influence decision making and/or in violation of the law.
3. This policy applies to everyone working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns and our business partners, contractors, consultants, suppliers, distributors, agents and any other third-party representatives.
4. Our policy is fully supported by our Board. All members of the Group's Management Board take overall responsibility for ensuring compliance with our legal and ethical obligations and will implement our policy within their part of the Group. Management at all levels are responsible for ensuring those reporting to them understand and comply with our policy.

Further details are available from management and with reference to the UK government guidance to the anti-bribery legislation held on file in our compliance department.

Note this policy does not restrict the giving of items such as calendars and gift-baskets of moderate value in a transparent way to thank customers for their business where this does not breach the customers own policies or UK legislation.