Global Switch

01

Anti-bribery and Corruption Policy

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ISSUE, REVIEW AND AMENDMENT

This policy shall be made available through the intranet (Switch) and its issue, and any subsequent revisions, notified to the relevant person through an internal memorandum or other appropriate form of communication.

An Appointed Person shall review this policy annually to re-affirm its conformity to the current requirements of Corporate Policy or immediately if its contents are deemed to be no longer valid.

Where revisions are required, they shall be made by replacement of the applicable page(s). An amended revision number and the date of revision shall identify each revised document; this shall be detailed within the document revision table below.

Owner	**Chief Legal Officer**
Sponsor	**Chief Executive Officer**
Review Period	Annual

Document Reviews				
Date	Revision	Reviewer	Approver	Document changes
26 April 2022	1	Eoghainn Calder	John Corcoran	
01 April 2023	2	Laura Calder	Kate Simpson	
23 July 2026	3	Heather Lawton	Eoghainn Calder	

1.0 POLICY STATEMENT

1.1 Global Switch conducts all its 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 and Corruption.

1.2 Global Switch takes its legal responsibilities seriously. We comply with all laws relevant to countering Bribery and Corruption in the jurisdictions in which we operate. Global Switch is also subject to UK laws, including the Bribery Act 2010, in respect of its conduct both in the UK and abroad, and aligns its approach with the United Nations Convention against Corruption.

1.3 This policy should be read alongside Global Switch's Financial Crime Policy and Gifts and Hospitality Policy. Together, these policies form part of Global Switch's framework for preventing Bribery, Corruption and related financial crime risks.

2.0 ABOUT THIS POLICY

2.1 The purpose of this policy is to:

a) set out Global Switch's position on Bribery and Corruption and the standards expected of those who work for, or on behalf of, Global Switch;

b) provide practical guidance on how to recognise and deal with Bribery and Corruption risk; and

c) explain how this policy operates alongside Global Switch's broader framework for managing financial crime risk (including third-party due diligence, sanctions screening, escalation and record-keeping).

2.2 This policy does not form part of any contract of employment or other contract to provide services, and Global Switch may amend it at any time.

3.0 WHO DOES THIS POLICY APPLY TO

3.1 This policy applies to all persons working for any group company of Global Switch or on its behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners, sponsors, or any other person associated with us. Please note that there are separate policies relating to those persons working in France and Germany, which take into account jurisdiction-specific requirements.

4.0 WHO IS RESPONSIBLE FOR THE POLICY?

4.1 The Chief Executive Officer (CEO) has overall responsibility for the effective operation of this policy and has delegated responsibility for overseeing its implementation to the Chief Legal Officer (CLO). Suggestions for change should be made to the CLO.

4.2 The CLO has day-to-day responsibility for this policy. Line managers are responsible for ensuring their teams understand and comply with this policy.

4.3 The CLO will oversee periodic monitoring of (i) training completion, (ii) gifts and hospitality declarations and trends (including register activity), (iii) third-party due diligence and escalations, and (iv) reported concerns and outcomes (in anonymised form where appropriate). Findings and any remediation actions will be reported to the Executive team at least annually.

5.0 DEFINITIONS

5.1 The following definitions apply to this policy unless the context otherwise requires.

5.2 **"Acts in Support of Corruption"** includes money laundering or concealment of criminal proceeds and other conduct commonly associated with Corruption risk. The relevant controls and escalation processes are addressed in the Financial Crime Policy.

5.3 **"Advantage"** means any financial or other benefit or thing of value, whether tangible or intangible, and includes money, gifts, loans, fees, hospitality, services, discounts, preferential treatment, business opportunities, or the award or retention of a contract or other commercial benefit.

5.4 **"Bribery"** means offering, promising, giving or accepting any financial or other Advantage, to induce the recipient or any other person to act Improperly in the performance of their functions, or to reward them for acting Improperly, or where the recipient would act Improperly by accepting the Advantage.

5.5 **"Corruption"** is the abuse of entrusted power or position for private gain and includes Acts in Support of Corruption.

Examples:

Offering a bribe: You offer a potential client tickets to a major sporting event, but only if they agree to do business with us.

This would be an offence as you are making the offer to gain a commercial and contractual advantage. We may also be found to have committed an offence because the offer has been made to obtain business for us. It may also be an offence for the potential client to accept your offer.

Receiving a bribe: A supplier gives your nephew a job, but makes it clear that in return they expect you to use your influence in our organisation to ensure we continue to do business with them.

It is an offence for a supplier to make such an offer. It would be an offence for you to accept the offer as you would be doing so to gain a personal advantage.

5.6 **"Facilitation Payments"** are small, unofficial payments made to secure or expedite a routine action (for example, by a Public Official).

5.7 A person acts **"Improperly"** where they act illegally or dishonestly, or contrary to an expectation of good faith, impartiality or trust, including by abusing a position of trust.

5.8 **"Kickbacks"** are payments or benefits provided in return for a business favour or Advantage.

5.9 **"Public Official"** includes any officer or employee of a government, regulator or public authority, any person acting in an official capacity (whether appointed or elected), and any employee or representative of a government-owned or government-controlled entity.

5.10 **"Third-Party"** means any individual or organisation outside the Global Switch group that you deal with in connection with your work for Global Switch, or that acts for or on behalf of Global Switch. This includes (without limitation) actual or potential customers, clients, suppliers, contractors, consultants, agents, advisers and other intermediaries, distributors, business contacts, joint-venture/consortium partners, and any government or public body (including its advisers, representatives and officials), as well as Public Officials and political parties.

6.0 IDENTIFYING RISKS OF BRIBERY AND CORRUPTION

6.1 Global Switch may be more exposed to Bribery and Corruption risk where we run high-value tenders (including construction/delivery and major plant or equipment sourcing), acquire land or negotiate competitive commercial opportunities, interact with Public Officials or government-linked entities (for example, for permits, licences or inspections), use intermediaries (such as agents, consultants or introducers), or receive unusual payment requests.

6.2 In these situations you must:

a) follow the applicable approval, procurement and contracting processes;
b) ensure appropriate third-party due diligence and escalation is completed before committing (including before issuing a purchase order, signing a contract, or making any payment), in line with the Financial Crime Policy where relevant; and
c) keep clear records that demonstrate the legitimate business purpose for any payment, gift, hospitality or expense.

6.3 If any of the red flags in clause 17 apply, stop and escalate before proceeding.

7.0 WHAT YOU MUST NOT DO

7.1 It is not acceptable for you (or someone on your behalf) to:

a) give, promise to give, or offer, a payment, gift or hospitality with the expectation or hope that an Advantage will be received, or to reward an Advantage already given;
b) give or accept a gift or hospitality during any commercial negotiations or tender process, if this could be perceived as intended or likely to influence the outcome;
c) accept a payment, gift or hospitality from a Third-Party that you know or suspect is offered with the expectation that it will provide an Advantage for them or anyone else in return;
d) unless expressly permitted and pre-approved under the Gifts and Hospitality Policy, offer or accept a gift to or from government officials or representatives, or politicians or political parties;
e) threaten or retaliate against another individual who has refused to commit a Bribery offence or who has raised concerns under this policy; or
f) engage in any other activity that might lead to a breach of this policy.

7.2 Where concerns relate to the integrity, ownership, source of funds or conduct of a Third-Party, employees must ensure that appropriate checks are completed in accordance with the Financial Crime Policy before any commitment is made.

7.3 It is a criminal offence to offer, promise, give, request, or accept a bribe. Individuals found guilty can be punished by imprisonment and/or a fine and employers that fail to prevent Bribery can face an unlimited fine, exclusion from tendering for public contracts, and damage to its reputation.

8.0 FACILITATION PAYMENTS AND KICKBACKS

8.1 Global Switch does not make, and will not accept, Facilitation Payments or Kickbacks of any kind.

8.2 You must avoid any activity that might lead to a Facilitation Payment or Kickback being made or accepted by Global Switch or on our behalf, or that might suggest that such a payment will be made or accepted. If you are asked to make a payment on Global Switch's behalf, you should always be mindful of what the payment is for and whether the amount requested is proportionate to the goods or services provided. You should always ask for a receipt which details the reason for the payment. If you have any suspicions, concerns or queries regarding a payment, you should raise these with your line manager.

8.3 Payments connected to Public Officials, agents or intermediaries may present heightened Bribery, Corruption or other financial crime risks and must be escalated and assessed in accordance with the Financial Crime Policy.

9.0 GIFTS, HOSPITALITY AND EXPENSES

9.1 Global Switch recognises that reasonable and proportionate business gifts, hospitality and related expenses can be a legitimate part of building and maintaining business relationships. However, gifts and hospitality can create Bribery and Corruption risk if they influence (or could be seen to influence) a business decision, create a sense of obligation, or lack transparency.

9.2 You must never offer, give, request or accept any gift, hospitality or expense that is intended (or could reasonably be perceived) to influence the recipient's judgement or to obtain or retain business or an Advantage, or to reward an Advantage already given. You must not offer or accept cash or cash equivalents.

9.3 All gifts, hospitality and related expenses must be lawful, reasonable, proportionate, transparent and for a legitimate business purpose, and must be offered and accepted openly (not secretly).

9.4 The detailed rules on what is permitted, approval requirements and what must be recorded are set out in the Gifts and Hospitality Policy, and you must comply with that policy at all times.

9.5 Extra caution applies where gifts, hospitality or expenses involve Public Officials, government-linked entities, intermediaries, or higher-risk jurisdictions. Where relevant, additional escalation, approvals and/or third-party checks may be required under the Financial

Crime Policy and the Gifts and Hospitality Policy. If you are unsure, do not proceed and speak to your line manager or escalate in line with this policy.

9.6 All gifts, hospitality and related expenses must be recorded and declared in accordance with the Gifts and Hospitality Policy (including any register and approval requirements), and must be provided openly, proportionately and for a legitimate business purpose. If you are unsure, do not proceed and seek guidance or escalate in line with this policy.

10.0 CONFLICT OF INTEREST

10.1 A conflict of interest arises where your personal interests (financial or otherwise) conflict, or could reasonably be seen to conflict, with the interests of Global Switch, or where your personal relationships or outside activities could affect (or appear to affect) your impartiality or decision-making.

10.2 You must avoid situations where you take part in, influence, or appear to influence, any decision where a conflict may arise. You must not use your position at Global Switch to advance your own interests, or those of family members, relatives or close personal friends.

10.3 Conflicts (including perceived conflicts) can often be managed appropriately if they are identified and declared early. If you have, or propose to take up, any outside interest, appointment or employment alongside your role at Global Switch that creates, or could reasonably be seen to create, a conflict of interest, you must declare it to your Regional Group Director and the Group HR Director before accepting or continuing that arrangement. You must also declare any conflict that arises in connection with a tender, procurement, contract award, payment decision, or interaction with a Third-Party.

10.4 If a conflict is identified, you must follow any management steps put in place (for example, removing yourself from a decision, changing reporting lines, or applying additional oversight) and cooperate with any information requests required to assess and manage the conflict.

11.0 DONATIONS

11.1 Global Switch does not make contributions to political parties, politicians or political campaigns. Any political donation by an individual must be made in their own name and must not be connected to, or presented as affiliated with, Global Switch.

11.2 Charitable donations, sponsorships and community contributions can present Bribery and Corruption risk (particularly where linked to permitting, procurement, tendering or relationships with Public Officials). No donation or sponsorship may be offered or made on behalf of Global Switch unless it is lawful, transparent, properly documented, and approved in advance by a member of the C-Suite team.

11.3 Any approved donation or sponsorship must have a clear legitimate purpose, be paid to an appropriate and verified recipient, and be recorded accurately in Global Switch's books and records.

12.0 RECORD KEEPING

12.1 Global Switch must keep financial records and have appropriate internal controls in place which will evidence the business reason for making payments to Third Parties.

12.2 You must declare and keep a written record of all hospitality or gifts given or received, which will be subject to managerial review, in accordance with our Gifts and Hospitality policy.

12.3 You must submit all expenses claims relating to hospitality, gifts or payments to Third Parties in accordance with our expenses policy and record the reason for expenditure.

12.4 All accounts, invoices, and other records relating to dealings with Third Parties including suppliers and customers should be prepared with strict accuracy and completeness. Accounts must not be kept "off-book" to facilitate or conceal improper payments.

12.5 Records relating to third-party due diligence, enhanced reviews and escalation decisions are maintained in accordance with the Financial Crime Policy.

13.0 YOUR RESPONSIBILITIES

13.1 You must ensure that you read, understand and comply with this policy.

13.2 The prevention, detection and reporting of Bribery and Corruption are the responsibility of all those working for Global Switch or under our control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.

13.3 You must notify your line manager as soon as possible if you believe or suspect that a conflict with this policy has occurred or may occur in the future.

13.4 You are also responsible for cooperating with due diligence and information requests required under the Financial Crime Policy and for escalating red flags or concerns identified during third-party interactions.

14.0 HOW TO RAISE A CONCERN

14.1 You are encouraged to raise concerns about any issue or suspicion of Bribery or Corruption and/or breach of this policy at the earliest possible stage.

14.2 If you are offered a bribe, asked to make one, or you believe or suspect that a Bribery, Corruption or related financial crime risk involving a Third-Party, payment or transaction has arisen or may arise, you must notify your line manager as soon as possible, who may escalate the matter as necessary to the Group HR Director and the CLO.

14.3 If you are unsure about whether a particular act constitutes Bribery or Corruption, raise it with your line manager. Do not proceed until the position is clear

14.4 If you do not feel comfortable raising a concern with your line manager (for example, because they may be involved), you may raise it directly with the CLO or Group HR Director. Concerns may also be raised under the Whistleblowing Policy and Procedure or through Global Switch's independent whistleblowing channel, details of which are published on our website.

15.0 PROTECTION

15.1 Individuals who refuse to accept or offer a bribe, or who raise concerns or report another's wrongdoing, are sometimes worried about possible repercussions. Global Switch aims to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken.

15.2 Global Switch is committed to ensuring no one suffers any detrimental treatment as a result of refusing to take part in Bribery or Corruption, or because of reporting in good faith their suspicion that an actual or potential Bribery or other Corruption offence has taken place, or may take place in the future. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the Group HR Director immediately. If the matter is not remedied, and you are an employee, you should raise it formally using our Grievance Procedure, which is available on the Switch.

16.0 TRAINING AND COMMUNICATION

16.1 Training on this policy forms part of the induction process for all individuals who work for Global Switch. Refresher training will be provided at least annually and more frequently where appropriate.

16.2 Global Switch's zero-tolerance approach to Bribery and Corruption must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and as appropriate thereafter.

17.0 POTENTIAL RISK SCENARIOS: "RED FLAGS"

17.1 The following are examples of "red flags" that may arise during the course of your work and could indicate Bribery, Corruption or other financial crime risk. The list is not exhaustive and is for illustrative purposes only.

If you encounter any of these red flags in connection with a Third-Party, tender, transaction, contract award or payment, you must report them promptly in accordance with this policy:

a) you become aware that a Third-Party engages in, or has been accused of engaging in, improper business practices;

b) you learn that a Third-Party has a reputation for paying bribes, or requiring that bribes are paid to them, or has a reputation for having a "special relationship" with foreign government officials;

c) a Third-Party insists on receiving a commission or fee payment before committing to sign up to a contract with us, or carrying out a government function or process for us;

d) a Third-Party requests payment in cash and/or refuses to sign a formal commission or fee agreement, or to provide an invoice or receipt for a payment made;

e) a Third-Party requests that payment is made to a country or geographic location different from where the Third-Party resides or conducts business;

f) a Third-Party demands lavish entertainment or gifts before commencing or continuing contractual negotiations or provision of services;

g) a Third-Party requests that a payment is made to "overlook" potential legal violations;

h) a Third-Party requests that you provide employment or some other Advantage to a friend or relative;

i) you receive an invoice from a Third-Party that appears to be non-standard or customised;

j) a Third-Party insists on the use of side letters or refuses to put terms agreed in writing;
k) you notice that we have been invoiced for a commission or fee payment that appears large given the service stated to have been provided;
l) a Third-Party requests or requires the use of an agent, intermediary, consultant, distributor or supplier that is not typically used by or known to us; or
m) you are offered an unusually generous gift or offered lavish hospitality by a Third-Party.

Additional red flags, together with escalation and due diligence guidance relevant to third-party relationships and higher-risk transactions, are set out in the Financial Crime Policy.

18.0 BREACHES OF THIS POLICY

18.1 Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

18.2 Global Switch may terminate its relationship with other individuals and organisations working on our behalf if they breach this policy.

18.3 Employees should be aware that in certain circumstances Global Switch may be required to, or may decide to, report a serious breach or incident to the appropriate authorities, including but not limited to any regulatory or enforcement authority.

Thank you

For taking the time to familiarise yourself with this document, if you have any questions please do not hesitate to contact a member of our team, or alternatively, further information can be found on our website:

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