



ANTI-BRIBERY & CORRUPTION POLICY STATEMENT

Company: TipTop Media Management Limited

Statement Type: Anti-Bribery & Corruption Policy

TipTop Media Management Ltd (the company) values its long-standing reputation for ethical behaviour and integrity. Conducting business with a zero tolerance approach to all forms of corruption is central to these values, the company's image and maintained reputation.

The policy statement below sets out the standards expected of all employees in relation to anti-bribery and corruption. In particular, all employees must adhere strictly to relevant laws in this area, including The Bribery Act 2010.

The Policy is also relevant for third parties who perform services for or on behalf of the company. The Company expects those persons to adhere to the Policy or have in place equivalent policies and procedures to combat bribery and corruption.

OUR ZERO TOLERANCE APPROACH TOWARDS CORRUPTION OF ALL KINDS

All employees, upon appointment, are informed that it is a criminal offence to offer, promise, pay, request or accept a bribe. A bribe does not need to be a monetary sum. It can be any form of advantage, offered or received.

A contract does not need to have been won for a corruption offence to have been committed. Similarly, a recipient does not need to benefit personally from a bribe and that bribery can occur in the private and public sector.

The company's policy consists of four rudimentary rules that all employees must strictly adhere to:

- Do not offer, promise or pay bribes
- Do not request, agree to or accept bribes
- Do not threaten or punish a person who has refused payment or acceptance of a bribe
- Do not threaten or punish a person who has raised concerns about possible bribery or corruption

Given the risks of corruption are not always obvious, employees are asked to follow these principles:

- Do not make payments to someone (or favour them in any other way) if you know that this will lead to misuse of their position (or them performing their functions improperly).
- Do not misuse your position (or perform your functions improperly) in connection with payments (or other favours) for yourself or others.
- If in doubt of a perceived personal benefit ensure that you enter a record in the company's 'gift' register.

BREACHES OF THE POLICY


- Employees who breach this policy could face disciplinary action which could lead to dismissal from their job for misconduct or gross misconduct.
- We may terminate our relationship with third parties if they breach this policy.



REPORTING

If any employee is in doubt as to whether a potential act could give rise to corruption concerns, the matter should be referred up to their line manager.

This policy statement is made in pursuant of The Bribery Act 2010 and constitutes TipTop Media Management Ltd.'s ant-bribery and corruption statement for the calendar year ending December 31st, 2020.

Signed: .....(Managing Director)

Date: 04.01.2021.....