

Anti-Bribery and Corruption Code of Conduct

The elimination of bribery and corruption is central to Excel Networking's core values and to this end a code of conduct has been introduced to the business covering the key values, principles and responsibilities we expect our employees, advisors, consultants, customers and suppliers to adhere to. The main components of the code are as follows:

- Excel Networking does not participate in any form of Bribery or Corruption
- Excel Networking will not make or accept any form of bribe
- Excel Networking will comply with the relevant rules and regulations in force in each country in which we operate
- Excel Networking has set out processes to ensure that Bribery and Corruption cannot take place within its business
- All Excel Networking directors and employees are required to comply with our code of conduct and processes wherever they may be situated
- Excel Networking recognises that in the normal course of business donations, hospitality and gifts may either be given or received and clear guide lines on what is/is not acceptable have been put in place together with rules for reporting, monitoring and authorisation
- All Excel Networking employees are encouraged to proactively manage the policy within the business and with third parties in accordance with the set rules and processes to ensure that Excel Networking does not inadvertently make or accept anything that may be considered to constitute a bribe.

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