

## ANTIBRIBERY POLICY STATEMENT

All Directors, Management and Employees of ELUXI Ltd. are committed to conducting our business to the highest standards of integrity, honesty and ethical conduct. We consider that all employees and individuals acting on the Company's behalf are responsible for maintaining the Company's reputation.

This Policy is applicable to all divisions and subsidiaries of the ELUXI and in meeting this commitment:

1. ELUXI considers that bribery and corruption has a detrimental impact on business by undermining good governance and distorting free markets.
2. ELUXI benefits from carrying out business in a transparent and ethical way.
3. ELUXI has zero tolerance of any form of bribery, whether direct or indirect, by, or of, its employees, officers, agents or consultants or any persons or companies acting for it or on its behalf.
4. The board and senior management are committed to implementing and enforcing effective systems, to prevent and eliminate bribery, in accordance with the Bribery Act 2010.
5. ELUXI has issued antibribery and corruption policy, together with policies on gifts and corporate hospitality, outlining ELUXI's position on preventing and prohibiting bribery and corruption. These policies apply to all employees and they are required to familiarise themselves and comply with these policies.
6. A bribe is a financial advantage or other reward that is offered to, given to, or received by an individual or company (whether directly or indirectly) to induce or influence that individual or company to perform public or corporate functions or duties improperly.
7. Employees and others acting for or on behalf of ELUXI are strictly prohibited from making, soliciting or receiving any bribes or unauthorised payments.
8. As part of its antibribery measures, ELUXI accepts transparent, proportionate, reasonable and bona fide hospitality and promotional expenditure, whether given or received.
9. A breach of these policies by an employee will be treated as grounds for disciplinary action.
10. Employees and other individuals acting for ELUXI should note that bribery is a criminal offence that may result in up to 10 years' imprisonment and/or an unlimited fine for the individual and an unlimited fine for ELUXI.
11. ELUXI will not conduct business with service providers, agents or representatives that do not support appropriate anti-bribery and corruption objectives.

The success of ELUXI's antibribery and corruption measures depend on all employees, and those acting for ELUXI, playing their part in helping to prevent bribery.

All employees and others acting for, or on behalf of, ELUXI are encouraged to report any suspected bribery in accordance with the procedures set out in the Policies or in the case of third parties to ELUXI' Directors. The Company will support any individuals who make such a report in good faith.

On behalf of the ELUXI Directors  
17<sup>th</sup> August 2016  
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