



Anti-Bribery & Corruption Policy

We at, Reign Capital Limited (hereafter referred to as “**Reign Capital**” or “**RC**”), have a zero-tolerance policy with respect to bribery and corruption. Reign Capital is committed to conducting its business fairly, and ethically. To fulfill this commitment, Reign Capital complies with the UK Bribery Act 2010 and requires all its employees and stakeholders to do the same.

Reign Capital promotes a culture where all its employees must act fairly, honestly, and ethically. Our zero-tolerance approach to bribery and corruption is demonstrated by:

- Delivering Anti-Bribery and Corruption training to all employees on an ongoing basis.
- Enabling employees to recognize and report any suspicion of bribery through our Whistleblowing policy.
- Investigating all instances of alleged bribery and corruption thoroughly and assisting the relevant authorities to carry out their investigation appropriately.
- Conducting due diligence of parties involved with Reign Capital.
- Ensuring that the hiring procedure is carried out in a fair manner.
- Establishing a pre-approval process relating to the offering and accepting of gifts and entertainment, as well as maintaining a gift and entertainment register.
- Conducting appropriate due diligence on third parties engaged by Flagstone.
- Ensuring that recruitment is fair and based on merit and suitability for a role. Hiring will not be used to influence any business decisions or to gain an unfair advantage for Flagstone.
- Thoroughly investigate any instances of alleged bribery and assist the police and other appropriate authorities in any resultant prosecution.
- Taking firm action against any individual(s) involved in bribery. Failure to adhere to Flagstone’s Anti-Bribery and Corruption Policy requirements may lead to disciplinary actions against an individual, up to and including dismissal or termination of a contract for services.

Reign Capital will not tolerate any action(s) taken in order to gain any commercial, contractual or regulatory advantage in a way that is unethical, or in order to gain any personal advantage for the individual or anyone connected with an individual. This includes the provision of facilitation investments. If any individual is in doubt as to whether a potential act constitutes bribery, the matter should be referred to Reign Capital through email at info@reigncapital.co.uk.

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