



CALEDONIA
INVESTMENTS

Anti-bribery policy

Always acting with professionalism,
fairness, and integrity



We conduct all of our business honestly and ethically.
We act professionally, fairly and with integrity in all our dealings
– wherever we operate. We are committed to implementing
and enforcing effective measures to counter bribery, taking
a zero-tolerance approach.

Our policy

Caledonia prohibits the offering, the giving, the solicitation or the acceptance of any bribe, whether cash or other inducement to or from any person or company, wherever they are situated and whether they are a public official or body or private person or company by any individual employee, agent or other person or body acting on Caledonia's behalf in order to gain any commercial, contractual or regulatory advantage for Caledonia in a way, which is unethical, or to gain any personal advantage, pecuniary or otherwise, for the individual or anyone connected with the individual.

This policy is not meant to prohibit any of the following activities, provided they are customary, proportionate and properly recorded:

- Normal and appropriate hospitality
- Ceremonial gifts at special occasions
- Fast-tracking a process when it is available to all on payment of a fee
- Providing resources to assist the person or body to make the decision more efficiently, provided it is for this purpose only

Our responsibilities

This anti-bribery policy applies to all Caledonia directors and employees, and preventing, detecting and reporting bribery is everyone's responsibility. We have whistleblowing procedures in place so that any suspicions can be reported confidentially.

Caledonia will investigate any actual or suspected breach of this policy, or the spirit of this policy. Employees may be subject to disciplinary action.