

ANTI-BRIBERY AND CORRUPTION POLICY STATEMENT

Fresh Recruitment Limited is committed to applying the highest standards of ethical conduct and integrity in its business activities. Every employee and individual acting on Network Group Holdings Limited's behalf is responsible for conducting company business honestly and professionally.

Fresh Recruitment Limited considers that bribery and corruption has a detrimental impact on business by undermining good governance and distorting free markets.

Fresh Recruitment Limited benefits from carrying out business in a transparent and ethical way and by helping to ensure that there is honest, open and fair competition in our sectors. Where there is a level playing field, Fresh Recruitment Limited can lead the market through innovation and by delivering excellent services and products to its customers.

Fresh Recruitment Limited does not tolerate any form of bribery by, or of, its employees or any persons or companies acting for it or on its behalf. The Board and senior management are committed to implementing and enforcing effective systems to prevent, monitor and eliminate bribery, in accordance with the Bribery Act 2010.

Fresh Recruitment Limited has issued an Anti-Bribery Policy. The Anti-Bribery policy applies to all employees and they are required to familiarise themselves and comply with the policy.

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.

Employees and others acting for or on behalf of Fresh Recruitment Limited and its subsidiary companies are strictly prohibited from making, soliciting or receiving any bribes or unauthorised payments. As part of its anti-bribery measures, Network Group Holdings is committed to engage only in transparent, proportionate, reasonable and bona fide hospitality and promotional expenditure.

A breach of Fresh Recruitment Limited Limited's Anti-Bribery policy by an employee will be treated as grounds for disciplinary action, which may result in a finding of gross misconduct and immediate dismissal. Employees and other individuals acting for Fresh Recruitment Limited 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 Fresh Recruitment Limited.

Fresh Recruitment Limited will not conduct business with service providers, agents or representatives that do not support Fresh Recruitment Limited Limited's anti-bribery objectives.

The success of Fresh Recruitment Limited Limited's anti-bribery measures depends on everyone playing their part in helping to detect and eradicate bribery. Therefore, all employees and others acting for, or on behalf of, Fresh Recruitment Limited are encouraged to report any suspicious activity to the Compliance Officer (the Company Secretary). Fresh Recruitment Limited Limited's Board will support any individuals who make such a report in good faith.