

 **Anti Bribery & Corruption**
Global Policy



Informa has zero tolerance for any and all forms of bribery and corruption.

Our position on bribery and corruption is simple; we do not tolerate bribery and corruption in any form. We would rather lose business than secure it through a bribe, kick-back or improper payment.

Key points



Never offer, accept, or authorise anything of value with the intention of obtaining any kind of commercial advantage for Informa



Ensure all accounts and financial records are complete and accurate. Make sure there are no undisclosed or vaguely described transactions that could be concealing corrupt activity



Carry out appropriate background checks on current and potential business partners, so that we can be as confident as possible that they meet our high ethical standards



Never offer any gift or entertainment to any government or public official without prior approval. Get approval from your local lawyer, divisional compliance or Chief Finance Officer for ALL such gifts or entertainment to ensure you are not breaking the law



If you are offered or asked for a bribe REFUSE – and report it immediately to your local lawyer, Group Compliance or via Speak Up

Why is this important?

Corruption undermines trust, harms economies, and gives unfair advantages. It is illegal in almost all countries, and the UK and U.S. anti-bribery regulations are enforced outside their national boundaries. As a UK-listed company, Informa strictly prohibits all forms of bribery and corruption worldwide.

What is a bribe?

A bribe is anything of value that is offered, given or received, with the **intention** of influencing someone - either to create bias in decision making or reward the improper execution of someone's job or public function. Bribery can be direct or indirect (through a third party or agent) and may benefit the recipient or someone else.

Bribes are usually financial but can take the form of anything of value including gifts and entertainment, travel, business opportunities, favourable contracts, jobs or donations. All forms of bribery and corruption are strictly forbidden.

This isn't to say any of the above are necessarily wrong to do in the usual course of business, so long as they are **modest, infrequent and business related**, and **transparently recorded**.

Gifts & entertainment – your limits

Gifts and entertainment can help to build strong business relationships, when done in the right way.

Accepting or offering gifts, meals, entertainment and travel should never have the goal or intention to influence business decisions or influence someone to misuse their position. We should also be alert to even the appearance of wrongdoing.

What do I need to do?

- Ensure everything has a genuine business purpose, is reasonable, and legal
- Do not offer or accept anything during key decisions, such as contract renewals
- Ensure you keep records of gifts or entertainment, given, offered or received, and
- Get approval from your line manager for anything over £150.

Any gifts, meals, entertainment or travel	Senior exec approval	Line manager approval	Record in ServiceNow	Clearly record in expenses
We OFFER over £150 (or local equivalent)		✓		✓
We RECEIVE over £150 (or local equivalent)		✓	✓	
Public or Government Official We OFFER to or RECEIVE from over £150 (or local equivalent)	✓	✓	✓	✓ when offering

What do you mean by “reasonable”?

A “reasonable” gift is going to be different depending on the recipient, and the key thing you need to consider is whether or not this specific gift might have the effect of influencing this specific recipient. If you’re giving a gift to a Hollywood A-listener, the value of that gift might be high, but it wouldn’t induce them to behave differently. If you gave that same gift to someone working for them, it might have the effect of making them act differently.

What gifts and entertainment are not acceptable?

- Anything illegal, including anything that breaches any local anti-bribery legal limits
- Cash
- Anything that is indecent or could damage our reputation
- Anything that violates our policies – i.e. that is overly lavish or unreasonable in value, or isn’t connected with business

Here are some examples:

Example that may be acceptable	Examples that should <u>not</u> be accepted
Lunch or dinner with business contact where the person paying for the meal is accompanying the recipient and where Informa business is being discussed (and isn't lavish!)	Meals or entertainment provided for business contacts where the person paying isn't attending
Promotional items that have the name/logo of the company and would be valued under £150	Items with a value over £150, or perceived value above that, <u>without</u> line manager approval
Chocolates, tea, small gift basket, local customary small tokens of respect	Items given on a regular basis e.g. meals or gifts under £150 that are given regularly, so that the cumulative amount over 12 months could appear excessive
A gift from a supplier to reward or thank a colleague for their hard work or to celebrate a big life event (e.g. marriage, arrival of a child or moving house)	Accepting a lavish present from a supplier in exchange for a perk (e.g. special treatment or a job opportunity for their child)
Offering a small gift to someone in a customary way or during season or festive period	Influencing someone with gifts to go against their duty and workplace obligations (e.g. giving a gift in return for confidential information)
Using gift cards (e.g. Amazon or similar) as a reward for early sign up to an event, or giving feedback	Using gift cards to induce a government official to give us special access to a dignitary

If you're unsure, talk to your Line Manager, or Compliance Manager and get their input too.

Dealing with Public or Government Officials

Government or Public officials include those in government departments, such as civil servants or those working in local government teams, but also employees of government owned or controlled commercial enterprises, international organisations, political parties and political candidates. In some countries, this can be a surprisingly extensive list, including banks and universities.

Be extra cautious when offering any gifts or hospitality to any government official – there are many laws in place that put strict limits on this. Check with your manager or Compliance if you're unsure.

What do I need to do?

If you are offered or would like to give gifts, meals, hospitality, entertainment or travel of any value to a government or public official you are required to declare it to your line manager, and with them, ensure your 'grandparent' (your manager's manager) has oversight of these activities. If you are unsure, always check with the Compliance team.

*Always record any gifts or hospitality shared with a public official, no matter how small.

I have been asked to make a small payment to a public/government official to speed up getting a license issued – what should I do?

This is a **facilitation payment** or “grease payment”, which is a small, unofficial payment made to a public official to speed up or secure the performance of a routine, necessary action they are legally obligated to perform. We must **not** make any payments (small or large) to public or government officials to secure or expedite a routine government action (such as clearing customs or to receive local utilities). Report any incidents or requests for a facilitation payment to your line manager and Group Compliance or use the [Speak Up service](#).

I feel imminent threat if I decline or refuse to make a facilitation payment.

If you find yourself in a situation where there is imminent threat to your personal safety (such as threat of physical violence), and you have no alternative but to make a facilitation payment or pay a bribe to avoid immediate harm – your safety is our priority – please make the payment. Report any incidents to your line manager and Group Compliance immediately it is safe to do so or use the [Speak Up service](#).

Political donations or contributions

Informa does not make donations to political parties, candidates or campaigns in any of the countries in which we operate, nor do we engage in lobbying.

Can I make a charitable donation?

We encourage long-term partnerships with charities in support of communities or industries relevant to us. Importantly, charitable giving or volunteering should comply with this Anti-bribery and corruption policy and never be used to create business advantage for Informa.

If you have any questions or would like more information regarding charitable giving or donations, please visit [Community Programme](#) on Portal.

Intermediaries - Sales agents and contractors

Informa could be liable for the behaviour of people that act on our behalf.

For this reason, where we engage contractors, sales agents, or use a joint venture partners (together referred to as “intermediaries”), we have an obligation to complete sufficient due diligence before entering into arrangements with them, to ensure that they are not acting corruptly, and to monitor their performance periodically to ensure ongoing compliance.

In short, if we can't do it, neither can they.

What do I need to do?

- Appropriate due diligence should be undertaken before we engage an intermediary, the level of which will vary depending on the circumstances (such as the location, type and size of contract) and you should use your judgement on a case-by-case basis: the procurement or M&A teams will be able to advise on relative risk.
- Engage with Group Legal before entering any joint venture arrangements to ensure appropriate due diligence has been conducted.
- Do not engage any third party who we know, or reasonably suspect, of engaging in bribery
- When working with Sales Agents, complete your [Division's sales agent due diligence](#) and registration processes
- Engage Legal to ensure that any contractual terms contain specific provisions in relation to bribery and corruption and refer to the **Informa Business Partner Code**
- Make sure any financial records are complete and accurate and review them regularly
- Conduct regular monitoring with those business intermediaries with whom we have a long-standing relationship
- Be vigilant to signs that an intermediary may be acting unethically or could be paying a bribe.

What are my responsibilities as a line manager?

- Set the tone for your team by **leading by example**, promoting integrity and guiding high-quality, long-term decision-making.
- **Identify and manage conflicts of interest** if they arise in your team by adding an independent person to decisions that could be influenced by personal relationships or biases (e.g., procurement benefiting family or friends). It is important you do not manage individuals with whom you have a personal relationship – should one develop, raise the matter to your line manager, or discuss with your HR Business Partner. Ask team members to disclose any conflicts in writing and consult HR or Compliance for complex cases
- Encourage your team to complete any **compliance training** within 30 days of joining and stay updated on compliance requirements.
- Verify all details (who, what, why, and presence of public officials) before approving **gifts or entertainment**. Reject an expense if there is insufficient information recorded in it, so that it can be corrected and resubmitted.
- Address potential breaches of this policy with the team member and consult HR or Compliance if necessary.
- If a colleague **raises a concern, listen carefully** and take all issues raised seriously, maintaining confidentiality, and remind them of our zero tolerance for retaliation against those who raise concerns. Act promptly to raise the matter to HR or Compliance to show commitment to integrity and support your team
- For more information read **How we lead – Guidance**.

I need help or advice?

If you observe something improper, unethical or inappropriate that could possibly be a perceived as bribery or corruption, it is important you report it.

There are a number of ways for you to tell us when something is wrong. You can speak to:

- Your line manager or Director
- HR; or
- Divisional or Group Compliance
- Use our [Speak Up service](#).

We do not tolerate retaliation in any form against anyone who raises a genuine concern.

Compliance with this policy and related guidance.

This policy applies to all Informa colleagues and anyone acting on our behalf, including contractors, agents, intermediaries, JVs and any other third parties.

Failure to comply with this policy, whether or not this is intentional, may lead to disciplinary action (up to and including dismissal). Bribery is illegal and could result in large fines for the company and criminal charges for anyone involved, up to and including imprisonment.

Policy Governance

Policy Owner:	Group Compliance
Applicable:	This policy is mandatory for all colleagues, contractors and those working on behalf of Informa
Classification:	Internal Policy
Last updated:	October 2025
Additional information:	For further information, contact compliance.officer@informa.com

Speak Up

whenever something
doesn't seem right



We want to know about any issues in our business, so we can take steps to make them right.

If you see any action or behaviour that is unethical, dangerous or inappropriate, we're here to listen.

It could be a potential conflict of interest, a case of harassment, suspected fraud or something else. If you are genuinely concerned, or even if you are unsure and just want to check, you can feel confident speaking up at Informa.

Speaking to colleagues

If you feel comfortable doing so, speak to:

- Your senior leader or manager, or
- HR, or
- Group Compliance

Using our Speak Up service

Hosted by an external third party:

- The service is available 24/7 in multiple languages
- Go to informa.com/speak-up for your regional phone number



Zero Retaliation

We do not tolerate retaliation in any form against anyone who raises a genuine concern.