

Anti-Bribery Policy

Introduction

- 1.The Company is committed to the highest standards of ethical conduct and integrity in its business activities. This Policy outlines the Company's position on preventing and prohibiting bribery, in accordance with the Bribery Act 2010.
- 2.The Company will not tolerate any form of bribery by, or of, its employees or any person acting on its behalf. The Company is committed to implementing effective measures to prevent bribery.

Scope of this policy

- 1.This Policy applies to all employees of the Company, and to temporary workers, consultants, contractors, agents and subsidiaries acting for, or on behalf of, the Company.
- 2.Every employee is responsible for maintaining the highest standards of business conduct. Any breach of this Policy is likely to constitute a serious disciplinary matter and could result in dismissal on the grounds of gross misconduct. It could also result in additional civil action or even criminal proceedings.
- 3.All employees are required to familiarise themselves and comply with this Policy.

What is prohibited?

- 1.The Company prohibits employees from offering, promising, giving, soliciting or accepting any bribe. The bribe might be cash, a gift or other inducement to, or from, any person or Company.
- 2.The bribe might be made as an attempt to gain a commercial, contractual or regulatory advantage, to obtain or maintain business, or to gain a personal advantage, financial or otherwise, for the individual or anyone connected with the individual.

Records

- 1.Employees are required to keep accurate, detailed and up-to-date records of all corporate hospitality, entertainment or gifts accepted or offered.

Corporate hospitality and promotional expenditure

- 1.The Company permits appropriate and proportionate corporate entertainment, gifts, hospitality and promotional expenditure that is undertaken for the purpose of establishing or maintaining good business relationships or to improve the image and reputation of the Company.
- 2.Any proposed expenditure over £100 must be reported immediately to your line manager. Employees may be required to set out in writing:
 - 1.the objective of the proposed client entertainment or expenditure;
 - 2.the identity of those who will be attending;
 - 3.the organisation that they represent; and
 - 4.details and rationale of the proposed activity.
- 3.The Company will approve business entertainment proposals only if they demonstrate a clear business objective and are appropriate for the nature of the business relationship.
- 4.The Company will not approve business entertainment where it considers that a conflict of interest may arise or where it could be perceived that undue influence or a particular business benefit was being sought (for example, prior to a tendering exercise).
- 5.Any gifts, rewards or entertainment received or offered from clients, suppliers or other business contacts should be reported immediately to your line manager. In certain circumstances, it may not

be appropriate to retain such gifts or be provided with the entertainment and employees may be asked to return the gifts to the sender or refuse the entertainment, for example, where there could be a real or perceived conflict of interest.

6.As a general rule, small tokens of appreciation, such as flowers or a bottle of wine, may be retained by employees.

7.If an employee wishes to provide gifts to suppliers, clients or other business contacts over £50 prior approval is required from your line manager.

Reporting suspected bribery

1.The Company depends on its employees to ensure that the highest standards of ethical conduct are maintained in all its business dealings. Employees are requested to assist the Company and to remain vigilant in preventing, detecting and reporting bribery.

2.Employees and associated persons are encouraged to report any concerns that they may have to your line manager as soon as possible. Issues that should be reported include:

- 1.any suspected or actual attempts at bribery;
- 2.concerns that other employees may be being bribed; or
- 3.concerns that other employees may be bribing third parties.

3.Any such reports will be thoroughly and promptly investigated, in confidence, where possible and appropriate. However, the Company may also report any matter to the relevant authorities and the police.


Brian Walker

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