Anti-Bribery Policy

Policy Statement
The Company is committed to conducting its business in an honest and ethical manner. We value our reputation for ethical behaviour, integrity, and financial probity. Bribery, in any form, is strictly prohibited and poses a serious risk to our reputation and legal standing. The Company is committed to complying with the requirements of the Bribery Act 2010 and maintaining adequate procedures designed to prevent bribery and corruption in all business activities.

Objectives
The Company seeks to:

- Set out a clear anti-bribery policy.
- Establish and implement appropriate anti-bribery procedures.
- Communicate this policy and any associated procedures to employees and others performing services on behalf of the Company.
- Carry out appropriate due diligence before engaging representatives, agents, or third parties.
- Monitor and review bribery risks and the effectiveness of controls and procedures.

Scope
This policy applies to all employees, officers, consultants, contractors, interns, agents, and any other individuals or entities acting on behalf of the Company, regardless of location.

Prohibited Conduct
The Company strictly prohibits the offering, giving, solicitation, or acceptance of any bribe, whether in the form of cash or any other inducement:

- To or from any person or company, whether public or private.
- By any individual employee, agent, or representative acting on behalf of the Company.
- In order to gain an unethical commercial, contractual, or regulatory advantage.
- For personal benefit or gain (either for the individual or someone connected to them).

The Company prohibits facilitation payments of any kind. Facilitation payments are unofficial payments made to secure or expedite routine government or administrative actions and are prohibited regardless of local custom or practice.

Any inducement that results in or is intended to result in a personal gain or advantage and influences someone to act improperly is considered bribery and is strictly forbidden.

Gifts and Hospitality
This policy does not prohibit the giving or receiving of reasonable and appropriate gifts and hospitality under the following conditions:

- They are customary and proportionate in a specific market or culture.
- They are not made with the intention of influencing a third party to obtain or retain business or a business advantage.
- They are transparently recorded in the Company's records.

If there is any doubt about the appropriateness of a gift or hospitality, it must be referred to a Company Director before proceeding.

Responsibilities

Preventing, detecting, and reporting bribery is the responsibility of all employees. The Company is committed to:

- Encouraging employees to remain vigilant and report any concerns regarding bribery.
- Providing secure and confidential communication channels for raising concerns.
- Treating all reports seriously and ensuring information is handled sensitively.
- Investigating all allegations thoroughly and cooperating with law enforcement where necessary.
- Taking appropriate disciplinary action against individuals found to have breached this policy.

Reporting Bribery

Any suspicion of bribery must be reported in confidence to one of the Directors. All reports will be handled sensitively and fully treated confidentially where possible. No employee will suffer retaliation, detriment, discrimination or disciplinary action for raising a genuine concern about suspected bribery, even where the concern is ultimately not substantiated.

Monitoring and Review

The Company will regularly review this policy to ensure its effectiveness. We are committed to continuous improvement in our approach to preventing bribery and corruption.

Document Control and Accountability

- Review Date: 14/10/2027
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