Anti Bribery and Corruption Policy

Bribery is a criminal offence - We do not, and will not, pay bribes or offer improper inducements to anyone for any purpose, nor do we or will we, accept bribes or improper inducements.

To use a third party as a conduit to channel bribes to others is a criminal offence. We do not, and will not, engage indirectly in or otherwise encourage bribery.

We are committed to the prevention, deterrence and detection of bribery. We have zero tolerance towards bribery. We aim to maintain anti-bribery compliance “business as usual”, rather than as a one-off exercise.

Objective of this policy:

To provide a coherent and consistent framework to enable our employees to understand and implement arrangements enabling compliance. In conjunction with related policies and key documents it will also enable employees to identify and effectively report a potential breach.

We require that all personnel, including those permanently employed, temporary agency staff and contractors -

- Act honestly and with integrity at all times and to safeguard the organisation’s resources for which they are responsible
- Comply with the spirit, as well as the letter, of the laws and regulations of all jurisdictions in which our organisation operates, in respect of the lawful and responsible conduct of activities

This policy applies to all of our organisation’s activities. For partners, joint ventures and suppliers, we will seek to promote the adoption of policies consistent with the principles set out in this policy.

Within our organisation, the responsibility to control the risk of bribery occurring resides at all levels of the organisation. It does not rest solely within assurance functions, but in all business units and corporate functions. This policy covers all personnel, including all levels and grades, those permanently employed, temporary agency staff, contractors, non-executives, agents, Members (including independent members), volunteers and consultants.

Anti Bribery Policy and Procedure

Setting out a clear anti-bribery policy and keeping it up to date

Making all employees aware of their responsibilities to adhere strictly to this policy at all times

Training all employees so that they can recognise and avoid the use of bribery by themselves and others

Encouraging its employees to be vigilant and to report any suspicions of bribery, providing them with suitable channels of communication and ensuring sensitive information is treated appropriately

Rigorously investigating instances of alleged bribery and assisting police and other appropriate authorities in any resultant prosecution

Taking firm and vigorous action against any individual(s) involved in bribery

Provide information to all employees to report breaches and suspected breaches of this policy

It is unacceptable to:

give, promise to give, or offer a payment, gift or hospitality with the expectation or hope that a business advantage will be received, or to reward a business advantage already given.

give, promise to give, or offer a payment, gift or hospitality to a government official, agent or representative to "facilitate" or expedite a routine procedure.

accept payment from a third party that you know or suspect is offered with the expectation that it will obtain a business advantage for them.

accept a gift or hospitality from a third party if you know or suspect that it is offered or provided with an expectation that a business advantage will be provided by us in return.

retaliate against or threaten a person who has refused to commit a bribery offence or who has raised concerns under this policy.

engage in activity in breach of this policy.

Include appropriate clauses in contracts to prevent bribery. Bribery is an inducement or reward offered, promised or provided to gain personal, commercial, regulatory or contractual advantage. With an expectation that a business advantage will be provided by us in return.

Facilitation payments are not tolerated and are illegal. Facilitation payments are unofficial payments made to public officials in order to secure or expedite actions.

No gift or hospitality is to be offered or accepted - nominal gifts and hospitality up to a financial value of £25 are acceptable - reasonable, proportionate gifts and hospitality made in good faith and that are not lavish are acceptable.

Staff Responsibilities:

The prevention, detection and reporting of bribery and other forms of corruption are the responsibility of all those working for the organisation or under its control. All staff are required to avoid activity that breaches this policy. You must:

- ensure that you read, understand and comply with this policy
- raise concerns as soon as possible if you believe or suspect that a conflict with this policy has occurred, or may occur in the future. As well as the possibility of civil and criminal prosecution, staff that breach this policy will face disciplinary action, which could result in dismissal for gross misconduct.

Raising a concern - This organisation is committed to ensuring that all of us have a safe, reliable, and confidential way of reporting any suspicious activity. We want each and every

member of staff to know how they can raise concerns. We all have a responsibility to help detect, prevent and report instances of bribery. If you have a concern regarding a suspected instance of bribery or corruption, please speak up – your information and assistance will help. The sooner you act, the sooner it can be resolved. There are multiple channels to help you raise concerns. Please refer to the Whistleblowing policy and determine your favoured course of action. Preferably the disclosure will be made and resolved internally (e.g. to your head of department/online reporting/telephone hotline). Secondly, where internal disclosure proves inappropriate, concerns can be raised with the regulator (e.g. external auditor. See “BIS prescribed persons” http://www.opsi.gov.uk/acts/acts2010/ukpga_20100023_en_1). Raising concerns in these ways may be more likely to be considered reasonable than making disclosures publicly (e.g. to the media).

Concerns can be anonymous. In the event that an incident of bribery, corruption, or wrongdoing is reported, we will act as soon as possible to evaluate the situation. We have clearly defined procedures for investigating fraud, misconduct and non-compliance issues and these will be followed in any investigation of this kind. This is easier and quicker if concerns raised are not anonymous. Staff who refuse to accept or offer a bribe, or those who raise concerns or report wrongdoing can understandably be worried about the repercussions. We aim to encourage openness and will support anyone who raises a genuine concern in good faith under this policy, even if they turn out to be mistaken.

We are committed to ensuring nobody suffers detrimental treatment through refusing to take part in bribery or corruption, or because of reporting a concern in good faith.

Compliance with the Bribery Act 2010

The Company shall review its anti-bribery arrangements at least annually to ensure continued compliance with the Bribery Act 2010 and any associated guidance issued by the UK Government. Reviews shall be undertaken by a Director and shall consider:

Risk assessments relating to bribery and corruption;
The effectiveness of internal controls;
Staff awareness and training requirements;
Any incidents, allegations or investigations arising during the review period;
Changes in legislation, guidance or business activities.
Reporting and Investigation

Any suspected act of bribery, corruption, fraud or anti-competitive behaviour must be reported immediately to the Managing Director or nominated Compliance Officer.

All reports will be treated confidentially and investigated promptly. Investigations will be conducted fairly and proportionately and may result in disciplinary action, contract termination, notification to regulators or referral to law enforcement authorities where appropriate.

Designated Contact

The Managing Director shall act as the designated Anti-Bribery Compliance Officer and primary point of contact for any concerns relating to bribery, corruption or anti-competitive behaviour.

Competition Law and Anti-Competitive Behaviour

The Company is committed to complying with all applicable UK Competition Law requirements, including the Competition Act 1998 and Enterprise Act 2002.

Employees, directors, subcontractors and representatives must not:

Agree prices with competitors;
Share commercially sensitive information;
Divide markets or customers;
Collude in tendering or bid-rigging activities;
Engage in any conduct that restricts fair competition.
Detection and Prevention of Anti-Competitive Behaviour

To detect and prevent anti-competitive behaviour, the Company shall:

Provide periodic training to relevant personnel;
Monitor tendering and procurement activities;
Maintain records of meetings with competitors and industry bodies;
Require staff to report concerns through the whistleblowing process;
Conduct annual compliance reviews of competition law risks;
Investigate any allegations of anti-competitive conduct promptly.

Signature: *E Smith-Hutchon* Date: 01/05/2026

Name: Eric Smith-Hutchon - Position: Director

Effective Date: 01/03/2024 Date of Last Revision: 01/05/2026