



Anti-bribery & Corruption Policy

Policy Statement

It is the policy of the Company to conduct our business in adherence to the highest ethical, professional, and legal standards, ensuring fairness, honesty, and transparency in all our dealings.

The Company maintains a steadfast zero-tolerance stance towards all forms of bribery and corruption, including but not limited to:

- The direct or indirect promise, offer, or authorization of anything of value;
- The solicitation or receipt of kickbacks, loans, fees, rewards, or other advantages;
- The provision of aid, donations, or contributions intended to exert improper influence;
- Payments for extravagant or inappropriate entertainment or travel;
- Favour, including offers of employment, aimed at gaining undue advantage;
- Facilitation payments;
- Inflated commissions;
- Fictitious consultancy agreements.
- Our commitment to combating bribery and corruption extends to all levels, regardless of whether it originates from corrupt officials, companies, or individuals. This commitment holds true in both public and private sectors, domestically and internationally.

To uphold this policy, we will:

- Provide comprehensive anti-bribery and corruption training to all Company personnel, equipping them to identify warning signs and take proactive measures to prevent such behaviour;
- Encourage employees, subcontractors, and business partners to promptly report any suspicions of bribery and/or corruption. Reports can be made through formal 'whistleblowing' channels or informally via our Company's 'open-door' policy, facilitating confidential discussions with senior management;
- Thoroughly understand the potential avenues for bribery during the Company's operations and their potential ramifications. We will establish suitable control measures to prevent their occurrence;
- Apply appropriate disciplinary and other measures in response to policy violations and breaches of anti-bribery and corruption laws.
- Non-compliance with this policy may lead to disciplinary actions, including dismissal or appropriate sanctions, as well as potential civil and criminal charges. We are committed to continuously monitoring and regularly reviewing this Anti-Bribery and Corruption Policy to ensure its ongoing suitability and effectiveness. We will also conduct periodic reviews of employee expense records to identify any anomalies falling under the scope of this Policy.

This Anti-Bribery and Corruption Policy Statement shall be distributed to all employees to ensure awareness and compliance.

Toby Massey
Technical Director

10/04/24

Date of signature