ANTI-BRIBERY POLICY

DISTRIBUTION

This Anti-Bribery Policy Procedures are communicated to all employees. A copy is available at the Head Office, held in the sites folder, and published on the internal company shared drive. All employees are encouraged to read it and communicate any queries to a Director.

REVISION HISTORY

Issue Number	Review Date	Changes	Signed
01	22/09/2023	Original version (draft)	
01	22/09/2023	Signed off	
01	20/09/2024	Review	
01	19/09/2025	Review	
02	20/05/2026	Address Updated	
02	18/09/2026	Review	

INTRODUCTION

The Company values its reputation for ethical behaviour and for financial probity and reliability. It recognises that over and above the commission of any crime, any involvement in bribery will also reflect adversely on its image and reputation. Its aim therefore is to limit its exposure to bribery by:

- Setting out a clear anti-bribery policy.
- Establishing and implementing anti-bribery procedures as appropriate.
- Communicating this policy and any relevant procedures to employees and to others who will perform services for the Company.
- Undertaking appropriate due diligence measures before engaging others to represent the Company in its business dealings.
- Monitoring and reviewing the risks and the effectiveness of any anti-bribery procedures that are in place.

POLICY

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The Company prohibits the offering, giving, solicitation or acceptance of any bribe (whether cash or other inducement)

- To or from any person or company (wherever they are situated or whether they are a public official or body or private person or company.
- By any individual employee, agent or other person or body acting on behalf of the Company.
- In order to gain commercial, contractual or regulatory advantage for the Company in a way that is unethical.

Or in order to gain any personal advantage (pecuniary or otherwise) for the individual or anyone connected with the individual.

This policy prohibits any inducement that results in personal gain or advantage to the recipient or any person or body associated with them and which is intended to influence them to take action that may not be solely in the interests of the Company or of the person or body employing them or whom they represent.

This policy is not meant to prohibit normal and appropriate hospitality or the giving of a gift on a festival or at another special time, provided they are customary in a particular market, are proportional and are properly recorded.

Inevitably, decisions as to what is acceptable may not always be easy. If you are in any doubt as to whether a potential act constitutes bribery, the matter should be referred to the Director before proceeding.

Responsibility of the Employee

The prevention, detection and reporting of bribery is the responsibility of all employees and the Company is committed to:

- Encouraging employees to be vigilant and to report any suspicion of bribery.
- Providing employees with suitable channels of communication and ensuring that sensitive information is treated appropriately.

- Investigation instances of alleged bribery and assisting the police and other appropriate authorities in any particular prosecution.
- Taking disciplinary action against any individual or individuals involved in bribery.

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Any suspicion of bribery should be reported in confidence to the Director, who has overall responsibility for bribery prevention.

Managing Director

Name: Danish Iftikhar **Sign:**  **Dated:** 22/09/2023