

## ANTI BRIBERY & CORRUPTION POLICY

### BRIBERY ACT 2010

#### Policy

We are committed to maintaining the highest standards of probity in our business. The Directors have formulated this policy having considered the six principles outlined in the guidance given by the UK Ministry of Justice. These are proportionality, top level commitment, risk assessment, due diligence, communication and monitoring and review.

The Board of Directors has overall responsibility for this Policy. The Chief Operating Officer has been appointed as the person with primary and day-to-day operational responsibility for implementing this Policy. They will also monitor the Policy's use and effectiveness and ensure that it is adhered to.

Our sales can take place internationally and we can source equipment and services globally which can make corruption harder to identify and combat. However, we are committed to a zero-tolerance approach towards bribery and corruption anywhere in our business and to implement and enforce effective systems to counter bribery and corruption. Whilst currently working exclusively in the UK and to UK law, the policy below has been accepted by the directors.

As the business grows and more international goods and services are sold or supplied, this policy will be regularly reviewed and updated before contracts in new countries are signed, to take account of any additional risks.

The Directors have therefore considered the following areas:

- The Supply of Goods
- The Supply of Services
- Hospitality
- Human Resources
- Charitable Donations
- Promotional Expenditure
- International growth

#### 1. The Supply of Goods to the Company and sale of Goods by the Company Policy

a. The majority of stock / hardware will be purchased through UK or EU. Any stock purchased from companies outside the EU must be authorised by a Director.

Level of Risk: Low

How we Monitor Compliance: Buyers to seek authorisation from a Director if they wish source products from anywhere other than UK or EU based suppliers.

b. No overseas agents are currently employed on our behalf.

Level of Risk: Low

How we Monitor Compliance: No agents to be appointed without the approval of a Director.

## 2. Service Providers to the Company Policy

Service providers will be UK or EU registered Companies, partnerships or traders

Level of Risk: Low

How we Monitor Compliance: All new service provider accounts to be authorised by a Director.

## 3. Hospitality

Genuine hospitality that is reasonable and proportionate is permitted.

### Policy

a. As a matter of courtesy visiting suppliers of goods and or services and colleagues from our industry or partnering industries will be offered tea and coffee and may be given a meal.

Level of Risk: Low

How we Monitor Compliance: Anything over and above this must be authorised by a Director.

b. Members of staff may accept hospitality that is reasonable and proportionate. It is not considered that the acceptance of invitations to sporting or cultural events by suppliers of goods or services will be disproportionate.

Level of Risk: Low

How we Monitor Compliance: All such invitations must be disclosed to the CEO or CIO and a log will be kept.

c. All Staff are forbidden from soliciting any gifts or hospitality in the course of their work for the Business.

Level of Risk: Low

How we Monitor Compliance: All staff are trained on our whistleblowing policy and have been trained on reporting incidents that could bring the reputation of the Company into disrepute or potentially be criminal.

## 4. Human Resources

### Policy

a. There are no individuals being paid who are not bona fide employees

Level of Risk: Low

How we Monitor Compliance: Details of all employees are logged By HR. Right to work in UK is checked on appointment. Any new posts have to be authorised by a Director.

b. All employees will undertake anti bribery and corruption training. All employees will receive a welcome from one of the directors (in person or by video) which will explain the Company's zero-tolerance approach towards bribery and corruption.

Level of Risk: Low

How we Monitor Compliance: HR will hold a log of all on line training completed by staff. Mandatory training will be required on joining the Company. Reminders to complete refresher training will be e-mailed to all staff.

## 5. Charitable donations

### Policy

As this policy covers UK operation only. At the moment, any donations will be made only to local and UK based charities.

Level of Risk: Low

How we Monitor Compliance: A record of all donations will be kept in the accounts system.

## 6. Promotional Expenditure

### Policy

The requirement for promotional material will grow as our market increases. At present, all material is online or part of low key branded items for free distribution. However, the Directors are aware that with expansion the requirement for promotional expenditure will increase and it is included in the policy at this stage as a placeholder for future policies.

Level of Risk: Low

How we Monitor Compliance: The Directors will decide on the offer which will be implemented by operations and promoted by the marketing department thereby providing adequate checks and balances.

## **How we comply with the six principles**

Proportionality - demonstrated in policies above

Top Level commitment - this document will be approved by the directors.

Due Diligence – outlined in the how we monitor compliance above.

Communication – this document will be circulated to the Board and senior managers, and the relevant parts will be communicated to staff in the staff handbook

Monitoring and review – see how we monitor compliance above. The Policy will be reviewed periodically by the Directors and reviewed with expansion of operations into any new country.

Last reviewed: 04/10/2024

Approved by the board of directors: 04/12/2024