

Anti-Bribery and Corruption Policy

We are committed to conducting business with integrity by being open, honest, honourable and transparent in everything we do. Our vision is for ethical behaviour and professional standards to be fully embedded within our business culture, decision-making and procedures.

We will conduct all of our business fairly, honestly and in compliance with all applicable laws and regulations. We take a zero-tolerance approach to bribery and corruption in any form.

This means that we will not:

- offer, give, request or accept bribes or improper payments;
- offer or accept gifts, hospitality or other benefits intended to improperly influence business decisions;
- make facilitation payments or unofficial payments of any kind;
- use third parties, agents, suppliers or intermediaries to engage in conduct that would breach this Policy or the UK Bribery Act 2010; or
- tolerate corrupt practices by any employee, contractor, consultant or business partner acting on our behalf.

This policy applies to all employees, directors, officers, temporary staff, contractors, consultants, and any third parties acting on behalf of the company. It applies in the UK and in all jurisdictions where the company operates.

We will work with regulatory authorities in all jurisdictions in which we operate to ensure that we comply fully with all legislation (including the UK Bribery Act 2010) and reporting requirements.

We encourage anyone who has concerns about the behaviour of the Company or any individual associated with the Company to report their concerns to a Director or Business Ethics Representative. Reports may also be made through the procedures set out in the Company's Whistleblowing Policy. The company prohibits retaliation against any individual who reports concerns in good faith.

Any breach of this Policy will be treated seriously and may result in disciplinary action, termination of contract, or referral to the appropriate authorities. This policy will be reviewed annually or when there are changes in legal or regulatory requirements.

Signed

Andrew P Hodgkinson
Director
Date: 18 May 2026