Introduction
The Bribery Act became law on 1 July 2011. It is designed to address bribery and corruption in the public and private sectors and will mean that any incorporated organisation, potentially could be liable to severe penalties if they fail to implement adequate procedures to prevent bribes being paid or received on their behalf.

There are four key offences under the Act:

- Section 1 - Bribing Another Person.
- Section 2 - Taking a Bribe.
- Section 6 - Bribing a Foreign Public Official and
- Section 7 - Failing to Prevent Bribery.

The Bribery Act applies to all employees in the Company. An organisation may be guilty of bribery even if only the individual offender knew of the bribery.

The Bribery Act introduces serious penalties such as unlimited fines for organisations and up to a maximum jail term of 10 years for the individuals involved.

Organisations will have a defence against prosecution if they can demonstrate that they had "adequate procedures in place to prevent bribery".

Definition of Bribery
Bribery is an inducement or reward offered, promised or provided to gain personal, commercial, regulatory or contractual advantage.

Objective of the Anti-Bribery Policy
The objective of the policy is to provide a coherent and consistent approach to ensuring compliance with the Bribery Act. It will enable all employees and any person who performs services for and on behalf of the Company (this could include contractors and subcontractors) to understand their responsibilities and allow them to take the necessary action, for example reporting any potential breaches of the policy.

The Company is committed to countering bribery and corruption in all forms and will not tolerate it in any of its activities.

The Company requires that all staff and all working or performing any service on or on behalf of the Company neither accept nor give bribes. Employees must:

- Always act honestly with integrity to safeguard the Company's resources for which they are responsible.
- Comply with the law (both in spirit and in the letter) and
- Abide by this policy.

Scope of the Policy
The policy applies to all the Company's activities including its work with strategic partners, third parties, suppliers, and others.

Ownership of the Policy
The policy has the approval of the Directors. The policy applies equally to all employees, regardless of position whether permanently employed, temporary agency staff, contractors, agents and consultants.

The Directors will own the policy, thereby ensuring that there is commitment at the highest level.

Anti-Bribery Policy
It is unacceptable to**:**

- Give, promise to give, or offer payment, gifts or hospitality with the expectation or hope that a favourable advantage will be received, or to reward a favourable advantage already given.
- Give, promise to give, or offer payment, gifts or hospitality to a government official, agent or representative to "facilitate" or expedite a routine procedure.
- Accept payment from a third party that is offered with the expectation that it will obtain a favourable advantage for them, whether known or suspected.
- Accept a gift or hospitality from a third party if it is offered or provided with an expectation that a favourable advantage will be provided by the Company in return, whether known or suspected.
- Retaliate against or threaten a person who has refused to commit a bribery offence or who has raised concerns under this policy and
- Engage in activity in breach of this policy.

Employees Responsibilities Including All those Working or Performing any Service on or Behalf of the Company:

Prevention, detection and reporting of bribery and other forms of corruption are the responsibility of all those working for the Company or under its control. All employees including third parties working or performing any service on or behalf of the Company are to avoid activity that breaches this policy, and must:

- Ensure that they read, understand and comply with the policy and
- Raise concerns as soon as possible if they suspect that this policy has been breached.

Adequate Procedures
The procedures need to be applied proportionately based on the level of risk of bribery to the Company.

Adequate Procedures Cover:

1. **Risk Assessment**
   That the Company assesses the nature and extent of its exposure to potential bribery from inside and outside. The Company should know who it is doing business with and whether this has risk implications.

2. **Top Level Commitment**
   That the Directors are committed to preventing bribery. That there is a clear statement that bribery is not acceptable. That the anti bribery policy is clearly communicated to all employees of the Company.

3. **Due Diligence**
   That the Company has policies in place and is aware of who it does business with. The Company is confident that its business relationships are transparent and ethical.

4. **Clear, practical and accessible policies and procedures**
   That the Company's policies and procedures to prevent bribery being committed on its behalf are clear, practical, accessible and enforceable.

5. **Effective Implementation**
   The anti-bribery policy and procedures are embedded throughout the Company. This means that the anti–bribery statements are embedded in the recruitment, retention, and operational policies and in training programmes.

6. **Monitoring and Review**
   That the Company monitors and reviews its policies and procedures on a regular basis to ensure that there is compliance.

Ultimately, whether procedures are adequate is for the courts to decide on a case-by-case basis.

Reporting to the Police; Sanctions and Redress

Employees who breach this policy face the possibility of civil and criminal prosecution. They also face disciplinary action, which could result in dismissal for gross misconduct.

Monitoring and Review of the Implementation of the Anti-Bribery Policy

The Directors will meet implement this policy and then will review compliance with this policy on an ongoing basis.

Signed

Tony Woods _____ Date: 22/05/2025

CEO