

ANTI-BRIBERY & CORRUPTION POLICY STATEMENT

This policy applies to all persons employed by Business Control Solutions Plc (the Company), including all full-time and part-time employees, contractors and any employees undertaking work experience with the Company (collectively, 'employees'). For the purposes of this policy, a 'contractor' describes a worker who provides their services to the Company via an intermediary.

Policy Statement

The Company is committed to ensuring that its business is conducted in an open and transparent manner and it will take all appropriate steps to address the risks of bribery and condemns all acts of bribery or corruption. Employees are expected to exhibit the highest standards of integrity, adhere to best practice in bribery prevention and report potential or known acts of bribery or corruption immediately.

Bribery and Corruption

Bribery is the offering, receiving or giving of a financial or other advantage with the intention of inducing a person to act improperly or to reward them for doing so.

Gifts and Hospitality

The Company does not believe that giving and receiving gifts (including Corporate Hospitality) is appropriate to the efficient conduct of its business except in very limited circumstances.

Receipt of Gifts and Hospitality

The Company maintains an Anti-Bribery Register as part of its anti-bribery measures. An employee who is given a gift of any sort by a business contact (e.g. an actual or potential customer or supplier) must disclose this and the nature of the gift to the Company. Failure to disclose gifts constitutes a disciplinary offence which is handled in accordance with the Company's formal disciplinary procedure.

Where the Company decides that the gift might constitute a bribe or other inducement, the employee is required to hand over the gift to their manager, who will return it to the donor with a suitable covering letter. In other instances, the Company may require the employee to return the gift to the donor with a polite note explaining the Company policy.

In exceptional cases, for example, where the Company decides that the gift was made as a token of the donor's gratitude for a service carried out to very high standards, the Company will allow the employee to retain the gift. However, since such gifts are sent only to a limited number of employees they should normally be shared with other employees.

Provision of Gifts and Hospitality

The provision of entertainment or hospitality to clients is subject to the Company's Expenses Policy which enforces limits on the amount an employee is authorised to spend on client entertainment. As part of its anti-bribery measures, the Company maintains a register of all client entertainment expenses which exceed the standard limit, along with details of the recipient.

Whilst it is not Company policy to offer gifts to suppliers, customers etc., the Company recognises that, occasionally, this may be appropriate, for example, when someone carries out work on a voluntary basis or for a nominal fee, or if a service has been carried out to an exceptional standard. In such a case, employees must submit a written request to their manager detailing the reason, nature, recipient and value of the gift. Approved gifts are recorded on the Company's Anti-Bribery register.

Employees who send gifts which have not been approved are not reimbursed for the cost of the gift. Such action may be treated as a disciplinary offence which will be dealt with under the Company's disciplinary procedure.

Charitable Donations

The Company endeavours to support charitable causes where possible. However, charitable donations and sponsorship are areas that are susceptible to bribery and corruption. Consequently, appropriate due diligence must be carried out on the recipient of any charitable donation or sponsorship before it is arranged.

Any proposal for such expenditure must set out full details of the recipient, including any connection with the Company, employees, customers or suppliers. Proposals are reviewed and approved before any payment is made or promised.

Employees who make donations on the Company's behalf which have not been approved will not be reimbursed. Such action may be treated as a disciplinary offence which will be dealt with under the Company's disciplinary procedure.

Donations made by employees through the Give As You Earn Scheme are not classed as company donations and are not subject to this policy.

Monitoring and review

The Company periodically monitors the effectiveness of its anti-bribery measures to ensure they remain suitable and effective. Employees are actively encouraged to report suspected cases of bribery or corruption to safeguard against potential future threats.