

# Anti-Bribery and Anti-Corruption Policy

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## Introduction

This anti-bribery policy exists to set out the responsibilities of iHasco Ltd. and those who work for us in regards to observing and upholding our zero-tolerance position on bribery and corruption.

It also exists to act as a source of information and guidance for those working for iHasco Ltd. It helps them recognise and deal with bribery and corruption issues, as well as understand their responsibilities.

## Policy Statement

iHasco Ltd. is committed to conducting business in an ethical and honest manner, and is committed to implementing and enforcing systems that ensure bribery is prevented. iHasco Ltd. has zero-tolerance for bribery and corrupt activities. We are committed to acting professionally, fairly, and with integrity in all business dealings and relationships, wherever in the country we operate.

iHasco will constantly uphold all laws relating to anti-bribery and corruption in all the jurisdictions in which we operate. We are bound by the laws of the UK, including the Bribery Act 2010, in regards to our conduct both at home and abroad.

iHasco Ltd. recognises that bribery and corruption are punishable by up to ten years of imprisonment and a fine. If our company is discovered to have taken part in corrupt activities, we may be subjected to an unlimited fine, be excluded from tendering for public contracts, and face serious damage to our reputation. It is with this in mind that we commit to preventing bribery and corruption in our business, and take our legal responsibilities seriously.

## Who is covered by this policy?

This anti-bribery policy applies to all employees (whether temporary, fixed-term, or permanent), consultants, contractors, trainees, seconded staff, home-workers, casual-workers, agency staff, volunteers, interns, agents, sponsors, or any other person or persons associated with us (including third-parties).

In the context of this policy, third-party refers to any individual or organisation our company meets and works with. It refers to actual and potential clients, customers, suppliers, distributors, business contacts, agents, advisers, and government and public bodies – this includes their advisers, representatives and officials, politicians, and public parties.

Any arrangements our company makes with a third party is subject to clear contractual terms, including specific provisions that require the third-party to comply with minimum standards and procedures relating to anti-bribery and corruption.

## Definition of Bribery

Bribery refers to the act of offering, giving, promising, asking, agreeing, receiving, accepting, or soliciting something of value or of an advantage so as to induce or influence an action or decision.

A bribe refers to any inducement, reward, or object/ item of value offered to another individual in order to gain commercial, contractual, regulatory, or personal advantage.

Bribery is not limited to the act of offering a bribe. If an individual is on the receiving end of a bribe and they accept it, they are also breaking the law.

## Employee Responsibilities

All employees must ensure that they have read, understood and will comply with the information contained within this policy.

Employees must not engage in any form of bribery, whether it be directly, passively, or through a third-party (such as an agent or distributor). They must not bribe a foreign public official anywhere in the world. They must not accept bribes in any degree and if they are

uncertain about whether something is a bribe or a gift or act of hospitality, they must seek further advice from the company's compliance manager (Managing Director, Nathan Pitman).

If any employee breaches this policy, they will face disciplinary action and could face dismissal for gross misconduct. A Managing Director has the right to terminate a contractual relationship with an employee if they breach this anti-bribery policy.

## Support

iHasco Ltd. promises to support any employee who has reported a concern relating to a potential act of bribery or corruption in good faith under this policy, even if investigation finds that they were mistaken. iHasco Ltd. will ensure that no one suffers any detrimental treatment as a result of refusing to accept or offer a bribe or other corrupt activities because they reported a concern relating to a potential act of bribery or corruption.

Detrimental treatment is defined under this policy as dismissal, disciplinary action, treats or unfavourable treatment in relation to the concern the employee raised.

If you have reason to believe you have been or are being subjected to unfair treatment as a result of reporting a concern or refusal to accept a bribe, you should inform your line manager or the compliance manager immediately.