



Anti-Bribery and Corruption Policy



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1. Policy Statement

Safetec Direct Ltd (“the Company”) is committed to conducting its business in an honest, ethical and transparent manner. We take a zero tolerance approach to bribery and corruption and are committed to acting professionally, fairly and with integrity in all business dealings and relationships, wherever we operate.

This policy sets out the responsibilities of the Company and of those working for or on behalf of the Company in observing and upholding our position on bribery and corruption.

2. Purpose of the Policy

The purpose of this policy is to: -Ensure compliance with applicable anti bribery and anti corruption laws, including the UK Bribery Act 2010 - Protect Safetec Direct Ltd from the risks associated with bribery and corruption - Provide guidance on recognising and dealing with bribery and corruption risks

3. Scope

This policy applies to all persons working for Safetec Direct Ltd or on its behalf in any capacity, including employees, directors, officers, agency workers, consultants, contractors, interns, agents, distributors, suppliers and any other associated persons.

4. Definitions

Bribery means offering, promising, giving, requesting or accepting any financial or other advantage to induce or reward improper performance of a function or activity.

Corruption is the abuse of entrusted power for private gain.

Improper performance refers to a breach of an expectation that a person will act in good faith, impartially or in accordance with a position of trust.

5. What Is Not Acceptable

It is not acceptable for any person covered by this policy to: - Give, promise or offer a bribe - Request, agree to receive or accept a bribe -

Bribe a foreign or domestic public official - Make or accept facilitation payments (payments made to secure or speed up routine government actions) - Threaten or retaliate against another individual who refuses to participate in bribery or corruption - Engage in any activity that might lead to a breach of this policy

6. Gifts, Hospitality and Expenses

Reasonable and proportionate hospitality or promotional expenditure is permitted where it is: - Given in good faith - Transparent and properly recorded - Appropriate to the circumstances - Not intended to influence or secure an improper business advantage

Cash gifts or cash equivalents (such as vouchers) are strictly prohibited.

All gifts and hospitality must comply with any internal approval and reporting procedures in place.

7. Facilitation Payments

Safetec Direct Ltd prohibits facilitation payments of any kind, regardless of local custom or practice. Any request for such a payment must be reported immediately.

8. Political and Charitable Contributions

The Company does not make political donations. Charitable donations and sponsorships must be legitimate, transparent and approved in accordance with Company procedures, and must not be used as a means of bribery.

9. Responsibilities

Management

Senior management is responsible for: - Ensuring this policy is communicated and understood - Promoting an ethical culture - Assessing bribery and corruption risks

Employees and Associated Persons

All individuals covered by this policy must: - Read, understand and

comply with this policy - Avoid any activity that could lead to a breach - Raise concerns as soon as possible if they suspect wrong doing

10. Reporting Concerns

Employees and associated persons are encouraged to raise concerns about any issue or suspicion of bribery or corruption at the earliest possible stage.

Reports may be made to a line manager or senior management. The Company will support anyone who raises genuine concerns in good faith and will not tolerate retaliation.

11. Record-Keeping

The Company must keep accurate and complete records of all financial transactions, including gifts, hospitality and expenses. False, misleading or incomplete records are strictly prohibited.

12. Training and Communication

The Company will provide appropriate training and communication to ensure understanding of this policy and the risks of bribery and corruption.

13. Breaches of This Policy

Any breach of this policy may result in disciplinary action, up to and including dismissal. Breaches may also result in civil or criminal penalties for the individual and the Company.

14. Monitoring and Review

This policy will be monitored regularly and reviewed at least annually to ensure it remains effective and compliant with applicable laws.

Approved by: Safetec Direct Ltd Management

Approved Date: February 2026

Next Review: February 2028