




Anti-bribery and Corruption Policy		
<b>Issue Date:</b> 02-Jan-2025	<b>Document #:</b> BUS-PL-001	<b>Revision #:</b> V03

## Anti-bribery and Corruption Policy

	Name	Job Title	Signature	Date
<b>Author</b>	Simon Rice	Compliance Manager		02-Jan-2025
<b>Reviewer</b>	Nicola Coull	Managing Director		02-Jan-2025
<b>Approval</b>	Simon Rice	Compliance Manager		02-Jan-2025

### 1.0 Introduction

The purpose of this policy is to establish controls to ensure compliance with all applicable anti-bribery and corruption regulations, and to ensure that the Company's business is conducted in a socially responsible manner.

### 2.0 Scope

This policy covers:

- Bribes
- Gifts and hospitality
- Facilitation payments
- Political contributions
- Charitable contributions

### 3.0 Responsibilities

This policy applies to all individuals working at all levels and grades, including directors, the senior management team, managers, employees (whether permanent, fixed-term or temporary), consultants, contractors, or any other person associated with the Company, or any of our subsidiaries or their employees, wherever located (collectively referred to as employees in this policy).

In this policy, third party means any individual or organisation the Company comes into contact with during the course of business, and includes actual and potential clients, customers, suppliers, distributors, business contacts, agents, advisers, and government and

---

<b>Anti-bribery and Corruption Policy</b>		
<b>Issue Date:</b> 02-Jan-2025	<b>Document #:</b> BUS-PL-001	<b>Revision #:</b> V03

public bodies, including their advisors, representatives and officials, politicians and political parties.

The Managing Director has overall responsibility for ensuring this policy complies with the Company's legal and ethical obligations, and that all those under the Company control comply with it.

The Senior Management Team has primary and day-to-day responsibility for implementing this policy, and for monitoring its use and effectiveness and dealing with any queries on its interpretation.

All Managers are responsible for ensuring those reporting to them are made aware of and understand this policy and are given adequate and regular training on it.

All employees receive mandatory training during their onboarding to the company to ensure they are knowledgeable and understand the company's approach to anti-bribery and corruption. Every individual has personal responsibility for upholding the highest standards of conduct and complying with the Company's zero tolerance stance on bribery and corruption.

#### **4.0 Definitions/Abbreviations**

##### Definitions

The Company                      Connect 2 Cleanrooms Limited

#### **5.0 Referenced Documents**

BUS-WI-001                      Expenses Booklet

#### **6.0 Policy**

Bribery is the offering, promising, giving, accepting or soliciting of an advantage as an inducement for action which is illegal or a breach of trust. A bribe is an inducement or reward offered, promised or provided in order to gain any commercial, contractual, regulatory or personal advantage.

It is the Company policy to conduct all of our business in an honest and ethical manner. We take a zero tolerance approach to bribery and corruption. We are committed to acting professionally, fairly and with integrity in all of our business dealings and relationships wherever we operate and implementing and enforcing effective systems to counter bribery.

We will uphold all laws relevant to countering bribery and corruption in all the jurisdictions in which we operate. However, we remain bound by the laws of the UK, including the Bribery Act 2010, in respect of our conduct both at home and abroad.

Bribery and corruption are punishable for individuals by up to ten years' imprisonment and a fine. A company can face an unlimited fine, be excluded from tendering public contracts and face damage to their reputation, we therefore take our legal responsibilities very seriously.

<b>Anti-bribery and Corruption Policy</b>		
<b>Issue Date:</b> 02-Jan-2025	<b>Document #:</b> BUS-PL-001	<b>Revision #:</b> V03

**6.1 Bribes**

Employees must not engage in any form of bribery, either directly or through any third party (such as an agent or distributor).

**6.2 Gifts and hospitality**

Employees must not offer or give any gift or hospitality:

Which could be regarded as illegal or improper, or which violates the recipient's policies Unless approved in writing by the Managing Director

Employees may not accept any gift or hospitality from the Company's business partners:

If it is in cash

If there is any suggestion that a return favour will be expected or implied

Unless approved in writing by the Managing Director

If it is not appropriate to decline the offer of a gift, the gift may be accepted, provided it is then declared to the Managing Director and donated to charity.

**6.3 Political Contributions**

The Company does not make donations, whether in cash or kind, in support of any political parties or candidates, as this can be perceived as an attempt to gain an improper business advantage.

**6.4 Charitable Contributions**

Charitable support and donations are acceptable and encouraged, whether of products, services, knowledge, time or financial contributions. However, employees must be careful to ensure that charitable contributions are not used as a scheme to conceal bribery. The Company only makes charitable donations that are legal and ethical under local laws and practices. No donation must be offered or made without the prior approval of the Managing Director. All charitable contributions should be publicly disclosed.

**6.5 Employee responsibilities**

All employees must ensure that they read, understand and comply with this policy.

The prevention, detection and reporting of bribery and other forms of corruption are the responsibility of all those working for the Company or under the Company control. All employees are required to avoid any activity that might lead to, or suggest, a breach of this policy.

Employees must notify the Managing Director as soon as possible if they believe or suspect that a conflict with or breach of this policy has occurred, or may occur in the future.

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for gross misconduct. The Company reserves the right to terminate contractual relationship with other workers if they breach this policy.

**6.6 Record-keeping**

The Company must keep financial records and have appropriate internal controls in place which will evidence the business reason for making payments to third parties.

All employees must declare and keep a written record of all hospitality or gifts accepted or offered, which will be subject to managerial review.

All employees must ensure all expenses claims relating to hospitality, gifts or expenses incurred to third parties are submitted in accordance with the Expenses Booklet, BUS-WI-001, and specifically record the reason for the expenditure.

All accounts, invoices, memoranda and other documents and records relating to dealings with third parties, such as clients, suppliers and business contacts, should be prepared

---

<b>Anti-bribery and Corruption Policy</b>		
<b>Issue Date:</b> 02-Jan-2025	<b>Document #:</b> BUS-PL-001	<b>Revision #:</b> V03

and maintained with strict accuracy and completeness. No accounts must be kept as "off the book" to facilitate or conceal improper payments.

**6.7 How to raise a concern**

All employees are encouraged to raise concerns about any issue or suspicion of malpractice at the earliest possible stage. If an employee is unsure whether a particular act constitutes bribery or corruption, or has any other queries or concerns, these should be raised with the Managing Director.

**6.8 What to do if you are a victim of bribery or corruption**

It is important that you tell the Managing Director as soon as possible if you are offered a bribe by a third party, are asked to make one, suspect that this may happen in the future, or believe that you are a victim of another form of unlawful activity.

**6.9 Protection**

Employees who refuse to accept or offer a bribe, or those who raise concerns or report another's wrongdoing, are sometimes worried about possible repercussions. The Company aims to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken.

We are committed to ensuring no one suffers any detrimental treatment as a result of refusing to take part in bribery or corruption, or because of reporting in good faith their suspicion that an actual or potential bribery or other corruption offence has taken place, or may take place in the future. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the Managing Director immediately. If the matter is not remedied, and you are an employee, you should raise it formally using the process outlined in the Guidelines for Working Here.

**6.10 Training and communication**

Training on this policy forms part of the induction process for all new employees. All existing employees will receive regular, relevant training on how to implement and adhere to this policy. In addition, all employees will be asked to formally accept conformance to this policy on an annual basis.

The Company's zero tolerance approach to bribery and corruption must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and as appropriate thereafter.

**6.11 Monitoring and review**

The Management Team will monitor the effectiveness and review the implementation of this policy, regularly at the Management Review Meeting, considering its suitability, adequacy and effectiveness. Any improvements identified will be made as soon as possible.

Internal control systems and procedures will be subject to regular audits to provide assurance that they are effective in countering bribery and corruption.

All employees are responsible for the success of this policy and should ensure they use it to disclose any suspected danger or wrongdoing.

Employees are invited to comment on this policy and suggest ways in which it can be improved to the Compliance Manager.

---

<b>Anti-bribery and Corruption Policy</b>		
<b>Issue Date:</b> 02-Jan-2025	<b>Document #:</b> BUS-PL-001	<b>Revision #:</b> V03

## 7.0 Revision History

<b>Revision #</b>	<b>Reason for Change</b>	<b>Issue Date</b>
V01	New Document	20-Oct-2023
V02	Periodic Review Additional information on staff training	05-Dec-2024
V03	Rebrand from Angstrom Technology to Connect 2 Cleanrooms	02-Jan-2025