



FEBRUARY 8, 2024

ANTI BRIBERY & CORRUPTION POLICY

It is the steadfast policy of HUB Engineering Ltd to conduct all business activities in a manner that upholds honesty, integrity, and ethical standards. We maintain a zero-tolerance approach towards bribery and corruption, committing to conducting our business professionally, fairly, and with integrity, regardless of the location or context in which we operate. Our commitment is reinforced by the implementation and enforcement of effective systems to combat bribery and corruption. We fully adhere to all relevant laws and regulations, including the Bribery Act 2010 in the UK, in all our operations, both domestically and internationally.

The purpose of this policy is two-fold:

- To outline the responsibilities of all individuals associated with HUB Engineering Ltd in upholding our stance against bribery and corruption.
- To provide guidance and information to employees on how to recognize and address issues related to bribery and corruption.

Definition of Bribery: Bribery refers to the offering, promising, or providing of inducements or rewards with the intention of gaining a commercial, contractual, regulatory, or personal advantage.

Gifts and Hospitality: While our policy does not prohibit normal and appropriate hospitality, both given and received, to or from third parties, strict guidelines are in place regarding gifts:

- Gifts or hospitality are prohibited unless explicit written authorization has been obtained from any of the Directors of the Company.
- Any gifts given or received must adhere to specific criteria, including compliance with laws, appropriateness, openness, and avoidance of any intention to influence business decisions.

Facilitation Payments and Kickbacks: HUB Engineering Ltd strictly prohibits the making or acceptance of facilitation payments or kickbacks. These illicit payments undermine the integrity of business practices and are strictly prohibited.

Donations: The company does not make contributions to political parties. Charitable donations are only made after obtaining prior approval from a relevant Director and must comply with all applicable laws and ethical standards.

Responsibilities of Employees:

- All employees are required to read, understand, and comply with this policy.
- The prevention, detection, and reporting of bribery and corruption are the responsibility of all employees. Any suspected breaches of this policy must be reported promptly to the MD.
- Employees must maintain accurate records of all hospitality or gifts accepted or offered after obtaining appropriate authorization.



Protection and Reporting Concerns:

- Employees are encouraged to raise concerns about suspected malpractice at the earliest stage possible. All concerns should be reported following the procedures outlined in the whistleblowing policy.
- Employees who refuse to engage in bribery, corruption, or report suspected wrongdoing are protected and will not face reprisals.

Responsibility for the Policy: The Director of HUB Engineering Ltd is responsible for ensuring compliance with this policy and will regularly review its implementation and effectiveness.

The effectiveness of this policy will be monitored and reviewed regularly by the Director, with necessary improvements implemented promptly.

This policy forms an integral part of our commitment to ethical business conduct and adherence to legal requirements. It does not constitute part of an employee's contract of employment and may be amended at any time to reflect changes in legislation or business practices.

JAMIE MILLERSHIP
MANAGING DIRECTOR
