

ANTI BRIBERY & CORRUPTION POLICY STATEMENT

Management Systems Manual

PROCEDURE:
ISSUE: 1
REVISION: 1
DATED: 25/07/2025

Scope: This Anti-Bribery and Corruption Policy applies to all individuals working at all levels and grades, including senior managers, officers, directors, employees (whether permanent, fixed-term or temporary), consultants, contractors, trainees, seconded staff, homeworkers, casual workers, volunteers, interns, agents, sponsors, or any other person associated with us, or any of our subsidiaries or their employees, wherever located.

We will uphold all laws relevant to countering bribery and corruption in all the jurisdictions in which we operate. In particular though, we remain bound by the laws of the UK, including the Bribery Act 2010, in respect of our conduct both at home and abroad. For your information, a bribe is an inducement or reward offered, promised or provided in order to gain any commercial, contractual, regulatory or personal advantage.

We do not tolerate bribery and corruption. We will never offer, pay, solicit or accept bribes in any form, including those transactions known as facilitation payments (explained in more detail below). This policy extends to all our business dealings and transactions in all countries in which the Company or any of its associated companies operates.

This policy is given force by our training and monitoring programme which together reflect the latest changes in law, reputational demands and nature of our business. You must ensure that you read, understand and comply with this policy. In particular, you must avoid any activity that may lead to a breach of this policy, and you must notify your manager or a Director as soon as possible if you believe or suspect that a breach of this policy has occurred or may occur in the future. For example, if a client or potential client offers you something to gain a business advantage with us or indicates to you that a gift or payment is required to secure their business, you should report it.

You, as a staff member and representative of the Company, are required to comply with this policy. During the course of your employment with the Company, you must not, whether by direct or indirect means:

- offer, promise or give a financial or other advantage to another person, to induce or reward a person for improperly performing a relevant function or activity;
- receive or accept any financial or other advantage, to induce or reward a person for improperly performing a relevant function or activity; and
- bribe any Foreign Public Official ("FPO") in order to gain any influence for the purpose of obtaining or retaining business, or any other advantage in business for the Company.

An FPO includes any individual who holds a legislative, administrative or judicial position of any kind, whether appointed or elected, of a country or territory outside the UK, or is an official or agent of a public international organisation.

We do not make, and will not accept, facilitation payments or "kickbacks" of any kind. Facilitation payments are typically small, unofficial payments made to secure or expedite a routine government action by a government official. They are not commonly paid in the UK but may be common in some other jurisdictions in which we operate. Kickbacks are typically payments made in return for a business favour or advantage. If you are asked to make a payment on our behalf, you should always be mindful of what the payment is for and whether the amount requested is proportionate to the goods or services provided. You should always ask for a receipt which details the reason for the payment. All staff must avoid any activity that might lead to, or suggest, that a facilitation payment or kickback will be made or accepted by us. If you have any suspicions, concerns or queries regarding a payment, you should raise these with a Director.

You must always behave ethically when competing for business, when conducting business on behalf of the Company and when securing business from new and/or existing customers. All your dealings must be open and honest, and this includes conducting your client networking and procurement practices in a transparent manner (if applicable).

We require staff to conduct reasonable due diligence before entering into a relationship with a third party, and to monitor that relationship once formed. We need to know whom we are dealing with and need to take steps to ensure that they are conducting business on our behalf ethically and in accordance with the principles of this policy. This is likely to include, as a minimum, background checks on the third party, and an annual review of that third party's activities.

It is our policy to maintain a system of internal accounting controls and to make and keep books, ledgers and records which, in reasonable detail, accurately and fairly reflect transactions and the disposition of assets, and the reasons behind those transactions and disposals. False, misleading or incomplete entries in such records or in other documents are strictly prohibited. No undisclosed or unrecorded fund or account may be established for any purpose.

Both the knowing submission (by any member of staff) and acceptance (by accounting or other personnel) of false receipts or invoices is strictly prohibited and is subject to disciplinary action. We reserve the right to take such further action as is required to protect its position in this regard.

In order to prevent such offences occurring within or on behalf of the Company, you must adhere to the requirements of this policy and participate in any training and monitoring programmes that may be arranged from time to time. The Company will monitor the effectiveness and review the implementation of this policy, regularly 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. We recognise that market practice varies across the territories in which the Company does or may do business and what is normal and acceptable in one place may not be in another. However, as a staff member of the Company, you are its representative. Accordingly, you must not engage in any practice involving bribery, as detailed above, regardless of local custom or expectation.

If you suspect that anyone in the Company or any associate of the Company is or has been engaged in bribery activities, or you are the victim of bribery you must report your suspicions to a Director immediately.

If you report a suspicion, you will be protected from recrimination from your colleagues. We will ensure that your report is treated in a confidential manner. You will not suffer demotion, penalty, or other consequence for refusing to pay or receive bribes even if it may result in us losing business.

It is your sole responsibility to comply with the requirements of this policy. If you fail to comply with the above and are found to have committed bribery, we may be liable for unlimited fines, be excluded from tendering for public contracts and face damage to reputation, and you may face criminal prosecution potentially leading to imprisonment of up to 10 years. Furthermore, if you are found to be in breach of this policy, we will take disciplinary action against you and we will consider immediate termination of your contract for services in line with the disciplinary procedures outlined in the Employee Handbook.

In summary, it is not acceptable for you (or someone on your behalf) to:

- give, promise to give, or offer, a payment, gift or hospitality with the expectation or hope that a business advantage will be received, or to reward a business advantage already given;
- give, promise to give, or offer, a payment, gift or hospitality to a government official, agent or representative to "facilitate" or expedite a routine procedure;
- accept payment from a third party that you know, or suspect is offered with the expectation that it will obtain a business advantage for them;
- accept a gift or hospitality from a third party if you know or suspect that it is offered or provided with an expectation that a business advantage will be provided by us in return;
- threaten or retaliate against another worker who has refused to commit a bribery offence or who has raised concerns under this policy; or
- engage in any activity that might lead to a breach of this policy.

You should not accept or give a gift to a third party without the consent of a Director who will assess whether it complies with this policy. All gift giving and receiving shall be notified to a Director, in advance.

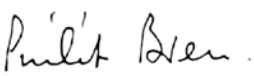
It is important to note that HMRC consider the value of gifts to be a taxable benefit which should be declared.

This policy does not prohibit normal and appropriate hospitality (given and received) to or from third parties.

In this policy, "third party" means any individual or organisation you come into contact with during the course of your work for us, and includes actual and potential clients, customers, suppliers, providers, distributors, business contacts, agents, advisers, and government and public bodies, including their advisors, representatives and officials, politicians and political parties.

This policy will be reviewed and maintained by the Quality Manager and the Management Review Committee.

Signed for and on behalf of Eland Cables



CEO

Date: 25/07/2025