

Multi-Source UK LTD

ANTI-BRIBERY POLICY

1. Purpose

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

2. Policy Statement

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 policy of **Multi-Source** to conduct all 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 our business dealings and relationships wherever we operate, and to implementing and enforcing effective systems to counter bribery.

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

Bribery and corruption are punishable for individuals by up to ten years' imprisonment and a fine. If **Multi-Source** is found to have participated in corruption, we could face an unlimited fine, be excluded from public tendering and suffer serious damage to our reputation. We therefore take our legal responsibilities very seriously.

3. Scope

3.1 Who is Covered by the Policy?

In this policy, **third party** means any individual or organisation you come into contact with during the course of your work for us. This includes actual and potential clients, customers,

suppliers, distributors, business contacts, agents, advisers, and public bodies including officials and politicians.

This policy applies to all individuals working at all levels and grades within **Multi-Source**, including senior managers, directors, officers, employees (permanent, fixed-term or temporary), contractors, consultants, trainees, seconded staff, casual workers, agency staff, interns, volunteers, agents, sponsors, or any other person associated with us or our subsidiaries, regardless of location.

This policy covers:

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

3.2 Bribes

Employees must not engage in any form of bribery, either directly or indirectly through any third party (such as agents or distributors).

3.3 Gifts and Hospitality

Employees must not offer or give any gift or hospitality:

- Which could be considered improper or illegal, or in breach of the recipient's own policies
- Unless approved in writing by the Managing Director

Employees may not accept gifts or hospitality from business partners:

- If it is in cash
- If there is an expectation of a favour in return
- Unless approved in writing by the Managing Director

3.4 Political Contributions

Multi-Source does not make political donations in cash or kind, as this could be seen as an attempt to gain an improper business advantage.

3.5 Charitable Contributions

Charitable support is encouraged — whether through services, time, or financial donations. However, such contributions must not be used to conceal acts of bribery. All charitable donations must be legal, ethical and authorised in advance by the Managing Director. All such contributions should be publicly disclosed.

4. Your Responsibilities

All employees must read, understand and comply with this policy. Preventing, detecting and reporting bribery is everyone's responsibility.

You must avoid any activity that might suggest or lead to a breach of this policy. You must inform the Managing Director if you suspect a breach has occurred or may occur.

Any employee who breaches this policy may be subject to disciplinary action, including dismissal for gross misconduct. We also reserve the right to terminate relationships with contractors or partners who breach this policy.

5. Record-Keeping

Multi-Source will maintain accurate financial records and implement internal controls to justify payments to third parties.

Employees must:

- Declare and log all hospitality or gifts offered or received, subject to managerial review
- Submit all related expenses with clear justification in line with the company expenses policy
- Ensure all accounts, invoices and documents are accurate and complete
- Not maintain “off-book” accounts to conceal improper payments

6. How to Raise a Concern

Concerns regarding bribery or suspected malpractice should be raised with the Managing Director as soon as possible. If uncertain whether an action constitutes bribery, seek guidance.

7. If You Are a Victim of Bribery

If you are offered a bribe, asked to pay one, or suspect one may occur, report it immediately to the Managing Director.

8. Protection

Multi-Source encourages openness and supports those who raise concerns in good faith. No employee will suffer any detriment for refusing to participate in bribery or for reporting suspected wrongdoing.

Detrimental treatment includes disciplinary action, dismissal, or other retaliation. If you believe you have been mistreated, raise this with your line manager or follow the company's Grievance Procedure.

9. Training and Communication

Anti-bribery training is provided during induction and refreshed regularly. All employees are required to confirm compliance with this policy annually.

Our zero-tolerance stance will be clearly communicated to all business partners at the beginning of our relationship and reinforced where necessary.

10. Policy Ownership

The **Managing Director** has overall responsibility for ensuring compliance with legal and ethical obligations under this policy.

The **Operations Manager** has day-to-day responsibility for implementation, monitoring, training, and addressing policy queries.

Managers at all levels are responsible for ensuring that employees understand and apply the policy, and for arranging relevant training.

11. Monitoring and Review

The **Operations Manager** will monitor the policy's effectiveness and review its implementation regularly. Improvements will be made promptly where needed.

Internal controls and systems will be audited periodically to ensure effectiveness in preventing bribery.

All employees are responsible for ensuring the success of this policy and for reporting any suspected breaches. Suggestions for improvement are welcomed.

This policy may be amended at any time and does not form part of any employee's contract of employment.

POLICY OWNER

(Gordon Young, Managing Director)

POLICY IMPLEMENTATION & REVIEW

(Gordon Young, Operations Manager)

POLICY REVIEW

Annual