



## **Ectron Limited: Anti-Bribery and Anti-Corruption Policy**

### **1. Introduction and policy statement**

Ectron Limited UK is committed to the highest standards of ethical conduct and integrity in all our business activities, at home and abroad. We take a zero-tolerance approach to bribery and corruption and will not tolerate it in any form, whether direct or indirect, by any individuals or companies acting on our behalf.

This policy is designed to ensure compliance with the Bribery Act 2010. Any breach will be treated as a serious matter, potentially resulting in disciplinary action, contract termination, and referral to law enforcement.

### **2. Scope of the policy**

This policy applies to all individuals working for Ectron Limited UK or on its behalf in any capacity. This includes all employees (whether permanent, temporary, or part-time), directors, contractors, agents, consultants, business partners, and any other associated persons.

### **3. What is bribery and corruption?**

Bribery involves offering or accepting financial or other advantages to improperly influence actions. This can include cash, gifts, favours, or hospitality. Corruption is the abuse of entrusted power for personal gain. Facilitation payments, which are small payments to expedite routine actions, and kickbacks, payments for business favours, are both strictly prohibited under the Bribery Act 2010.

### **4. Employee responsibilities**

All employees and associated persons must adhere to this policy, conduct business with integrity, and report any suspicions of bribery or corruption.

### **5. Gifts, hospitality, and expenses**

Gifts and hospitality must be reasonable, proportionate, and have a legitimate business purpose. They should not be offered or accepted during commercial negotiations if they could be seen as influential, and lavish hospitality is prohibited. Monetary gifts are never permitted. All offers of gifts and hospitality should be recorded.



#### **6. Third-party risk (due diligence)**

Ectron Limited UK requires associated persons, such as suppliers and contractors, to comply with this policy. Appropriate due diligence is conducted on third parties based on their risk level, and contracts include anti-bribery clauses.

#### **7. Reporting concerns (whistleblowing)**

Employees are encouraged to report concerns about potential bribery or corruption immediately to their manager or a director. A confidential whistleblowing procedure is available, and individuals reporting in good faith will be protected from harassment or victimisation.

#### **8. Training and communication**

This policy is communicated to relevant parties, and regular training is provided on bribery and corruption risks and reporting procedures.

#### **9. Monitoring and review**

The Board of Directors is responsible for monitoring compliance and will review the policy regularly to ensure its effectiveness and compliance with legislative changes.

#### **10. Statement approval**

Approved by the Board of Directors of Ectron Limited UK.

**On behalf of Ectron Limited**

**Mr. A Jones, Director.**