

## Chess Wise Limited – Bribery and Corruption Policy

Version: 1.0

Effective Date: June 2025

Reviewed By: Graham Foster, Operations

Next Review Date: June 2026

### Bribery and Corruption Policy

#### 1. Purpose

This policy aims to:

- Prevent bribery and corruption within Chess Wise Limited.
- Ensure compliance with the **UK Bribery Act 2010**.
- Promote ethical business conduct.

The UK Bribery Act 2010 includes four main offences:

1. Offering, promising or giving a bribe.
2. Requesting, agreeing to receive, or accepting a bribe.
3. Bribery of foreign public officials.
4. Failure of a commercial organisation to prevent bribery.

Organizations can defend themselves with proof of adequate procedures in place to prevent bribery—this policy forms a key part of such procedures.

#### 2. Scope

This policy applies to:

- All employees, officers, and directors.
- Contractors, agents, intermediaries, consultants, and any third parties acting on behalf of Chess Wise Limited, globally.

#### 3. Policy Statement

Chess Wise Limited has a **zero-tolerance approach** to bribery and corruption. Bribery in any form, whether direct or indirect, is strictly prohibited.

## 4. Definitions

- **Bribery:** Offering, promising, giving, accepting or soliciting an advantage as an inducement for an action which is illegal or unethical.
- **Corruption:** Abuse of entrusted power for private gain.

## 5. Prohibited Practices

Employees and associated persons must not:

- Offer or receive bribes, kickbacks, or facilitation payments.
- Offer anything of value (e.g. gifts, hospitality, donations) to improperly influence a decision.
- Ignore or fail to report suspected bribery.

## 6. Gifts and Hospitality

- Must be reasonable, proportionate, and for legitimate business purposes.
- Must not be offered or received with the intent to influence a decision.
- High-value or unusual gifts/hospitality must be declared and approved.

## 7. Charitable Donations and Sponsorships

Must:

- Be transparent and recorded.
- Not be used as a means to influence a business decision or gain an improper advantage.

## 8. Political Contributions

- Not permitted unless explicitly approved by a company director and fully compliant with local laws.

## 9. Due Diligence

- Conduct risk-based due diligence on third parties, especially those acting on the company's behalf.

## 10. Reporting and Whistleblowing

- Concerns should be reported by email to a company director.
- The company prohibits retaliation against anyone who raises concerns in good faith.

## 11. Training and Communication

- All employees must complete anti-bribery training.
- Policy will be communicated to all third parties working with the company.

## 12. Monitoring and Review

- Regular audits and risk assessments will be conducted.
- Policy reviewed annually or as required by changes in legislation or business practices.

## 13. Consequences of Breach

- Disciplinary action up to and including dismissal.
- Potential criminal charges under the Bribery Act.

### Signed:

Graham Foster  
Operations  
June 2025

Approved by:

Jasper Hijink  
Director

June 2025

