

## 1 Policy Statement

The purpose of this policy is to establish a clear framework for combating bribery, corruption, and fraud within Charter Tech. We are committed to maintaining the highest standards of integrity, accountability, and transparency in all our business dealings. This policy outlines prohibited practices, responsibilities, and procedures to prevent and respond to bribery, corruption, and fraud.

Charter Tech has a zero-tolerance stance on bribery, corruption, and fraud. We strictly prohibit any actions or practices that involve these activities, and we are dedicated to adhering to applicable laws, such as the UK Bribery Act, the U.S. Foreign Corrupt Practices Act (FCPA), and other relevant regulations. Violations of this policy will be treated as serious misconduct and may result in disciplinary action, including termination, and legal prosecution if warranted.

## 2 Scope

This policy applies to all Employees, Managers, Directors, Contractors, Consultants, and third-party representatives acting on behalf of Charter Tech, including Vendors, Suppliers, and other Business Partners. Compliance with this policy is mandatory.

## 3 Definitions

**Bribery:** Offering, giving, receiving, or soliciting any item of value to influence the actions of an individual or organisation in a position of trust.

**Corruption:** Abuse of entrusted power for private gain, including but not limited to bribery, embezzlement, and other forms of improper conduct.

**Fraud:** Intentional deception made for personal or financial gain, causing harm to another party.

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## 4 Prohibited Conduct

The following actions are strictly prohibited under this policy:

- Offering, giving, or accepting bribes or kickbacks.
- Giving or receiving facilitation payments, except when an employee's safety or security is at risk.
- Offering or accepting excessive gifts, hospitality, or entertainment that could be construed as a bribe or undue influence.
- Falsifying documents, records, or financial statements to conceal or misrepresent facts.
- Engaging in or aiding any form of fraud, embezzlement, or misappropriation of assets.
- Using company funds, assets, or resources for improper or unauthorized purposes.

## 5 Responsibilities

- Management: Ensure awareness of this policy, provide training, and enforce anti-bribery and fraud prevention measures.
- Employees and Representatives: Comply with this policy, report any incidents or suspicions of bribery, corruption, or fraud, and refuse to participate in or tolerate such actions.
- Head of Business Administration: Oversee adherence to this policy, investigate reports, provide guidance, and regularly review policy effectiveness.

## 6 Gifts and Hospitality

Gifts, hospitality, or other forms of courtesy may only be offered or accepted if they are of nominal value, infrequent, and do not create an appearance of impropriety. Any gifts exceeding £50 should be reported to your Line Manager.

## 7 Reporting and Investigation

**Reporting:** Any employee or third party aware of or suspecting a violation of this policy is encouraged to report it to their Line Manager, Head of Administration, or to the Managing Director.

**Investigation:** All reported concerns will be promptly and thoroughly investigated. Confidentiality will be maintained to the fullest extent possible, and retaliation against whistleblowers is strictly prohibited.

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## 8 Disciplinary Actions

Violations of this policy will result in disciplinary action up to and including termination. Legal action may also be pursued, and regulatory authorities may be notified if applicable.

## 9 Training and Awareness

Where deemed necessary, Charter Tech will provide training to employees and representatives to ensure understanding and compliance with this policy.

## 10 Policy Review

- This policy will be reviewed annually or in response to changes in legislation or organisational needs.
- Updates will be communicated to all employees.



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D A BENHAM

MANAGING DIRECTOR

06-Nov-2024



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B ELLIOT

HEAD OF ADMINISTRATION

06-Nov-2024

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