

Anti-Bribery & Anti-Corruption Policy

1. Purpose and Scope

1.1 This Anti-Bribery and Anti-Corruption Policy outlines the commitment of Connexion Developments Ltd to upholding the highest ethical standards by enforcing a zero-tolerance approach to bribery and corruption. It applies to all employees, stakeholders, and business associates.

1.2 This policy serves as a reference to help employees and associates recognize, prevent, and address potential bribery and corruption issues while understanding their responsibilities.

2. Policy Statement

2.1 Connexion Developments Ltd is dedicated to conducting business ethically and transparently. We strictly prohibit bribery and corrupt practices and are committed to implementing controls to prevent such activities.

2.2 We comply with all applicable anti-bribery and anti-corruption laws, including the UK Bribery Act 2010, both domestically and internationally.

2.3 Engaging in bribery or corruption can result in severe legal consequences, including imprisonment, fines, exclusion from tenders, and reputational damage. We are committed to strict adherence to legal and ethical obligations to mitigate such risks.

3. Applicability

3.1 This policy applies to all employees (temporary, permanent, or contract-based), officers, trustees, board members, consultants, contractors, interns, volunteers, agents, sponsors, and third-party representatives associated with Connexion Developments Ltd, regardless of location.

3.2 A third party includes individuals or organizations we engage with, such as clients, customers, suppliers, distributors, business contacts, government bodies, and public officials.

3.3 All contractual agreements with third parties must include provisions ensuring compliance with anti-bribery and corruption standards.

4. Definition of Bribery

4.1 Bribery is the act of offering, giving, requesting, or receiving something of value to improperly influence an action or decision.

4.2 Bribery includes any reward or inducement given in exchange for business, regulatory, contractual, or personal advantage.

4.3 Accepting a bribe is as unlawful as offering one. Employees must not engage in bribery, directly or indirectly, including through third parties.

4.4 If unsure whether an action constitutes bribery, employees must seek advice from the Compliance Manager.

5. Acceptable and Unacceptable Practices

5.1 This section addresses:

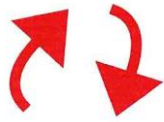
- Gifts and Hospitality
- Facilitation Payments
- Political Contributions
- Charitable Contributions

5.2 **Gifts and Hospitality** Acceptable gifts and hospitality must:

- Not influence business decisions or imply an obligation.
- Comply with local laws and company policies.
- Be of reasonable value and given transparently.
- Not involve cash or cash equivalents.
- Be disclosed to the Compliance Manager if above the pre-determined value threshold (generally £100).
- Not involve government officials without prior approval.

5.3 In culturally sensitive situations, unavoidable gifts must be reported to the Compliance Manager for assessment.

5.4 Any uncertainty regarding gifts or hospitality should be discussed with the Compliance Manager.



5.5 Facilitation Payments and Kickbacks Connexion Developments Ltd strictly prohibits facilitation payments and kickbacks. Employees facing security risks in such situations must:

- Minimize payments.
- Obtain a receipt stating the amount and reason.
- Record and report the payment to their line manager.

5.6 Political Contributions We do not make political donations, as these could be perceived as attempts to gain improper influence.

5.7 Charitable Contributions While we support charitable contributions, they must:

- Be legal and ethical.
- Not be used to facilitate bribery.
- Be approved by the Compliance Manager.

6. Employee Responsibilities

6.1 Employees must read, understand, and comply with this policy and related training programs.

6.2 Employees must prevent, detect, and report any bribery or corruption incidents.

6.3 Suspected or actual instances of bribery must be reported to the Compliance Manager.

6.4 Violations of this policy will result in disciplinary action, including potential dismissal and legal consequences.

7. Reporting Concerns

7.1 Employees should raise concerns regarding bribery or corruption at the earliest opportunity.

7.2 Concerns can be reported confidentially to a line manager, the Compliance Manager, the Director, or the Head of Governance and Legal.

7.3 Employees reporting concerns in good faith will be protected from retaliation.

7.4 Detrimental treatment for reporting concerns is prohibited, and any instances should be reported immediately.

8. Training and Communication

8.1 All employees receive anti-bribery training during onboarding and ongoing refresher courses.

8.2 This policy is communicated to all relevant stakeholders, including third-party business partners.

8.3 Additional training is provided where necessary to ensure compliance with the Bribery Act.

9. Record-Keeping

9.1 Connexion Developments Ltd maintains accurate financial records and internal controls to track payments, gifts, and hospitality.

9.2 All received and given hospitality and gifts must be recorded and subject to managerial review.

10. Policy Review and Monitoring

10.1 The Compliance Manager oversees the effectiveness of this policy and reviews it regularly.

10.2 Internal audits assess anti-bribery controls to ensure effectiveness.

10.3 Employees are encouraged to provide feedback for policy improvements.

10.4 This policy may be amended as necessary to enhance its effectiveness in preventing bribery and corruption.

Signed: *Michael G Freye* Managing Director

Print name: Michael G Freye

Dated: 11th March 2025