

Bribery and Anti-Corruption Policy

Purpose

Hartgraph Ltd is committed to conducting its business with integrity, honesty, and transparency. We have a zero-tolerance approach to bribery and corruption and are committed to acting professionally and fairly in all business dealings and relationships.

This policy outlines our responsibilities and the standards we expect from everyone who works for, or on behalf of, the company in preventing bribery and corruption.

Scope

This policy applies to all employees, directors, contractors, suppliers, and any other parties working on behalf of Hartgraph Ltd. It is applicable across all regions and sectors in which we operate.

Our Commitments

- Prohibited Conduct:

The following are strictly prohibited:

- Offering, giving or promising a bribe
- Requesting, agreeing to receive or accepting a bribe
- Bribing a public official, foreign or otherwise
- Failing to prevent bribery by anyone acting on behalf of the company

- Gifts and Hospitality

Gifts and Hospitality must be:

- Reasonable and proportionate
- Not intended to influence business decisions
- Approved in advance

Never

- Give cash or cash equivalents
- Accept or offer gifts during a tender process
- Offer hospitality to government officials, or to any type of auditor

- Facilitation Payments and kickbacks are strictly prohibited
- We expect all suppliers, agents, and contractors to adhere to this policy and to refer to our Code of Conduct for Suppliers and Sub-Contractors (point 3)
- The Directors are responsible for implementing and enforcing this policy. Employees and contractors must read, understand and comply with it. Finance/HR must maintain records of gifts, hospitality and third-party engagements.

Reporting Concerns

If you suspect bribery or corruption, report it to the Directors. All reports will be treated confidentially and investigated appropriately. No employee will suffer retaliation for refusing to engage in bribery or for reporting concerns in good faith.

Consequences of Breach

Violations of this policy may result in disciplinary action, up to and including dismissal and termination of contracts of third parties. Criminal prosecution under the Bribery Act 2010, which can result in imprisonment and/or unlimited fines.

Training and Communication

This policy will be:

- Communicated to all employees and new starters
- Provided to suppliers and contractors on our website
- Supported by training where appropriate

Review and Monitoring

This policy will be reviewed periodically or following significant changes in legislation or business operations. Monitoring and internal audits may be conducted to ensure compliance.