

# Anti-Bribery and Corruption Policy.

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**Approved By:** Claire Nelson, Global HR Director

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## **1. Introduction.**

It is the policy of Connect Managed Services (UK) Limited and its affiliates, trading as Connect (Connect), to conduct all of our business in an honest and ethical manner. We take a zero-tolerance approach to bribery and corruption and are committed to acting professionally, fairly and with integrity in all our business dealings and relationships.

## **2. Scope.**

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for gross misconduct. Any non-employee who breaches this policy may have their contract terminated with immediate effect.

This policy does not form part of any employee's contract of employment and we may amend it at any time. It will be reviewed regularly.

Who must comply with this policy?

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners.

## **3. Policy.**

### **3.1 What is bribery?**

Bribe means a financial or other inducement or reward for action which is illegal, unethical, a breach of trust or improper in any way. Bribes can take the form of money, gifts, loans, fees, hospitality, services, discounts, the award of a contract or any other advantage or benefit. Bribery includes offering, promising, giving, accepting or seeking a bribe.

All forms of bribery are strictly prohibited. If you are unsure about whether a particular act constitutes bribery, raise it with your manager or with HR.

### **3.2 Specifically, you must not:**

- Give or offer any payment, gift, hospitality or other benefit in the expectation that a business advantage will be received in return, or to reward any business received;
- Accept any offer from a third party that you know, or suspect, is made with the expectation that we will provide a business advantage for them or anyone else;
- Give or offer any payment (sometimes called a facilitation payment) to a government official in any country to facilitate or speed up a routine or necessary procedure.
- You must not threaten or retaliate against another person who has refused to offer or accept a bribe or who has raised concerns about possible bribery or corruption.

### **3.3 Gifts and hospitality.**

- 3.3.1 This policy does not prohibit the giving or accepting of reasonable and appropriate hospitality for legitimate purposes such as building relationships, maintaining our image or reputation, or marketing our products and services.
- 3.3.2 A gift or hospitality will not be appropriate if it is unduly lavish or extravagant or could be seen as an inducement or reward for any preferential treatment (for example, during contractual negotiations or a tender process).
- 3.3.3 Gifts must be of an appropriate type and value depending on the circumstances and taking account of the reason for the gift.
- 3.3.4 Gifts must not include cash or cash equivalent (such as vouchers) or be given in secret.
- 3.3.5 Gifts must be given in our name, not your name.
- 3.3.6 Promotional gifts of low value such as branded stationery may be given to or accepted from existing customers, suppliers and business partners.

### **3.4 Record-keeping.**

- 3.4.1 You must declare and keep a written record of all hospitality or gifts given or received by emailing [finance@weconnect.tech](mailto:finance@weconnect.tech). You must also submit all expenses claims relating to hospitality, gifts or payments to third parties in accordance with our expenses policy and record the reason for expenditure.
- 3.4.2 All accounts, invoices, and other records relating to dealings with third parties including suppliers and customers should be prepared with strict accuracy and completeness. Accounts must not be kept "off-book" to facilitate or conceal improper payments.

### **3.5 Training and communication.**

Training on this policy is provided for all staff and our zero-tolerance approach to bribery and corruption will, where appropriate, be communicated to clients, suppliers, contractors and business partners.

### **3.6 Monitoring and review.**

Connect monitors the effectiveness and reviews the implementation of this policy at appropriate intervals, considering its suitability, adequacy and effectiveness. Any improvements identified are made as soon as possible. Internal control systems and procedures are also subject to regular review to provide assurance that they are effective in countering any risks of bribery and corruption. All staff are aware that they are responsible for the success of this policy and should ensure they use it to disclose any suspected danger or wrongdoing.

### **3.7 How to raise a concern.**

If you are offered a bribe, or are asked to make one, or if you suspect that any bribery, corruption or other breach of this policy has occurred or may occur, you must notify the Operations Director as soon as possible.

#### 4. Responsibilities.

All employees are responsible for maintaining awareness of Connect's policies and procedures applicable to their role and for complying with them.

#### 5. Compliance.

Any breaches of Connect's policies may be subject to a formal investigation. Where proven, failure to comply will result in disciplinary action being taken against individuals determined to be responsible for the breach under Connect's Disciplinary Process up to and including summary dismissal for gross misconduct. Connect may also initiate legal action or refer the breach to relevant law enforcement authorities where warranted. Noncompliance by contracted third parties or their employees may result in termination of the supplier's contract.

#### 6. Information Classification.

This policy is classified as confidential and no part or extract from it or the associated files held on Connect's computer networks shall be distributed to any external organisation without a signed Non-Disclosure Agreement being in place.

#### 7. Review.

This Policy shall be reviewed on an annual basis, unless changes to business operations, relevant legislation or codes of practice necessitate an earlier amendment.

#### 8. References.

Title	Location
Disciplinary Policy	Corporate Network
Whistleblowing Policy	Corporate Network

## 8. Version Control.

Date	Version	Changes	Reviewer Name & Job Title	Approver Name & Job Title
1/08/2019	V1.6	Training / monitoring sections and Version Control Table added	Fiona Thompson, Compliance Manager	Clinton Groome, Operations Director /Information Security Forum (ISF)
8/11/2019	V1.7	New Branding applied	Fiona Thompson, Compliance Manager	Clinton Groome, Operations Director /Information Security Forum (ISF)
8/11/2020	V1.8	Annual Review – approved by Operations Director as part of staff handbook review	Fiona Thompson, Compliance Manager	Clinton Groome, Operations Director
24/6/2021	V1.9	Superficial changes only: new branding applied	Fiona Thompson, Compliance Manager	Fiona Thompson, Compliance Manager
17/05/2022	V2.0	Change owner from Clinton Groome to Mark Evans	Dimitris Damianou, Paralegal	Mark Evans, VP of Operations  Note: approved by VP of Operations as part of staff handbook review
20/02/2023	V2.1	Change owner from Mark Evans to Claire Nelson	Dimitris Damianou, Paralegal	Claire Nelson, Head of HR
20/02/2024	V2.2	Annual review – change made to branding	Nobuhle Bizabani, Compliance Assistant	Claire Nelson, HR Director
20/03/2025	V2.3	Removed reference to VP of Operations	Fiona Thompson, Compliance Manager	Claire Nelson, Global HR Director