KPO-118

Anti-Corruption and Bribery Policy

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1.1 This document has been app-roved by the Directors of the Company and describes the policy of the Company together with the practices and procedures to be followed in order to comply with the Bribery Act 2010.

1.2 It is an offence under section 7 of the said Act for a Company such as ours to fail to prevent bribery. We will be liable if any person connected with the Company (Director, Employee or Agent) commits an act of bribery. It will be a defence for the Company to show, on the balance of probabilities, that it had adequate procedures in place to prevent such acts.

1.3 The Company is committed to running a professional business, free from discreditable behaviour. In order to prevent this, the Company has put into effect appropriate and proportionate measures to deal with the risks that it faces. Any breach of this policy document will lead to disciplinary action, which may include dismissal. The Company will make all relevant resources available so as to ensure compliance with the Act.

1.4 It is the responsibility of the Directors of the Company to ensure compliance with the Act. All staff will be made aware of this document and will receive training as appropriate. This will be updated from time to time as required. It is a condition of their employment that all staff comply with this document and any update of it.

1.5 The Directors and Employees will report all instances of suspected bribery to a Director of the Company, who will investigate the matter further. If a criminal act is suspected then disciplinary action will be taken and the member of staff in question will be immediately suspended. The Police will also be notified.

1.6 Under no circumstances should any person who reports a suspicious activity be subjected to victimisation, whether or not the suspicion turns out to be justified.

1.7 The Company has undertaken a risk assessment and considers the risk of committing an offence under the Act to be low. The risk of bribing a foreign official or extra-territorial offences do not arise. The risks that the Company are subject to will be considered on an ongoing basis and will be reviewed annually.

1.8 Promotional expenditure which seeks to improve the image of the Company so as to establish cordial and professional relationships and maintain them is not unlawful. However, any such expenditure etc. Must be reasonable and proportionate.

1.9 If an event is offered to a client, a Director of the Company will be provided with all relevant information. This will include the cost and the nature of the hospitality and the names of the people attending the event. He will then decide if the event can be approved or whether modifications are required. If a Director or Employee is invited to an event, a similar procedure will be adopted.

1.10 No fees over and above proper fees agreed in advance for work undertaken shall be paid or indeed be accepted. No payment shall be made to a person for the award of a contract. The same principles shall apply to the use of a subcontractor and third parties engaged to act on behalf of the Company.

1.11 Donations to a charity shall be approved by a Director of the Company. These shall be properly audited so as to ensure that there can be no suspicion of an advantage that could be thought to have accrued to the Company or any of its Directors of Employees.

1.12 A copy of this document will be made available to all Directors, Employees and Agents of the company. It will also be made available to relevant third parties such as suppliers, customers and clients.

1.13 All staff and Directors will undergo training in terms of the Bribery Act and the requirements of this document. Any member of staff may approach a Director of the Company in absolute confidence so as to receive advice as to their conduct or to report a matter which relates or may relate to bribery.

1.14 This document will be reviewed on an ongoing basis and may be amended from time to time so as to meet the needs of the Company and/or reflect any changes in legislation

Signed: Javed Iqbal Position: Managing Director Date: 14/ 08/ 2026