EDPAK LIMITED

Anti-Bribery & Corruption Policy — Version 3.0

1. Purpose and Scope

This policy sets out EDPAK LIMITED's commitment to preventing bribery and corruption and the responsibilities of people working for or on behalf of EDPAK. It applies to directors, employees, temporary workers, consultants, agents, contractors, suppliers, business partners and other third parties acting for or in connection with EDPAK, whether in the UK or elsewhere.

EDPAK is committed to conducting business ethically, honestly, fairly and with integrity. EDPAK operates a zero-tolerance approach to bribery and corruption.

2. Legal Framework

EDPAK will comply with applicable UK anti-bribery and corruption laws, including the Bribery Act 2010. The policy is intended to support proportionate procedures designed to prevent bribery, identify concerns and respond appropriately.

3. What Is Bribery?

Bribery includes offering, promising, giving, requesting, agreeing to receive or accepting a financial or other advantage intended to induce or influence improper performance or to secure an improper business, contractual, regulatory or personal advantage.

Bribery can occur directly or through a third party. People acting for EDPAK must not offer, promise, give, request or accept a bribe.

4. Gifts and Hospitality

Reasonable and proportionate business hospitality or gifts may be acceptable where lawful and genuinely connected to legitimate business purposes. They must never be used to influence a decision improperly or create an expectation of a return favour.

- The gift or hospitality must not be intended to influence a business decision improperly.
- It must be lawful and appropriate in the circumstances.
- It must not be cash or a cash equivalent such as a voucher or gift certificate.
- It should be given or received openly and, where required by EDPAK, recorded.
- It must not be excessive or disproportionate.
- Particular caution is required where a public official, government representative or politically exposed person is involved.
- Any uncertain or potentially sensitive gift or hospitality must be referred to the company director before it is accepted or provided, where practicable.

EDPAK should maintain a gifts and hospitality record where appropriate, including the date, parties involved, description, approximate value, purpose and approval.

5. Facilitation Payments and Kickbacks

EDPAK prohibits facilitation payments and kickbacks. A facilitation payment is an unofficial payment intended to secure or speed up a routine governmental action. A kickback is an undisclosed payment or benefit provided in return for a business favour or advantage.

If a person is placed under a genuine and immediate threat to personal safety and believes a payment cannot safely be avoided, personal safety should take priority. The incident must be reported to the company director as soon as it is safe to do so, and the circumstances and amount should be recorded.

6. Political and Charitable Contributions

EDPAK will not make political donations or contributions intended to obtain an improper business advantage.

Charitable contributions may be made where lawful, transparent and genuinely charitable. They must not be used to disguise a bribe or obtain an improper commercial advantage and should be approved and recorded in accordance with EDPAK's internal procedures.

7. Third-Party Relationships

EDPAK recognises that bribery risk can arise through third parties. Appropriate due diligence and contractual controls should be applied to relevant suppliers, service providers, agents, contractors and business partners, proportionate to the risk and nature of the relationship.

Where appropriate, contracts should contain obligations requiring compliance with applicable anti-bribery and corruption laws and allowing EDPAK to respond to material concerns.

8. Employee and Representative Responsibilities

- Read and comply with this policy and any related procedures or training.
- Do not offer, promise, give, request or accept a bribe.
- Do not use a third party to do something that would be prohibited if done directly.
- Report suspected bribery, attempted bribery or requests for improper payments promptly.
- Seek guidance from a manager or company director when uncertain about a proposed gift, hospitality, payment or business arrangement.

9. Raising a Concern and Protection

Concerns should be raised promptly with a manager or company director. EDPAK will consider concerns seriously and will not tolerate retaliation against a person who raises a concern in good faith or refuses to participate in bribery or corruption.

10. Training and Communication

EDPAK will provide appropriate anti-bribery information or training to relevant personnel, proportionate to their role and the risks associated with their activities. EDPAK may communicate this policy to suppliers, service providers, contractors and business partners where appropriate.

11. Record Keeping and Controls

EDPAK will maintain accurate business and financial records and appropriate controls designed to prevent and identify improper payments. Relevant gifts, hospitality, charitable contributions and unusual payments should be documented where appropriate.

12. Monitoring and Review

The company director is responsible for overseeing the implementation and review of this policy. EDPAK will review the policy periodically and when there are material changes to its business, suppliers, services or legal requirements.

Document Management

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Version: 3.0
Effective date: 25 September 2026
Policy owner: Company Director
Review: At least annually and whenever material changes occur.