



**BRADAM**

# Bradam Ltd. Anti-Bribery and Corruption Policy

## 1. Purpose

Bradam Ltd. is committed to conducting business ethically, transparently, and in compliance with all applicable laws, including the **UK Bribery Act 2010**. This policy sets out our position on bribery and corruption and applies to all employees, contractors, suppliers, and third parties associated with the company.

## 2. Scope

This policy applies to:

- All employees (permanent, temporary, or contract)
- Directors and officers
- Consultants, subcontractors, agents, and intermediaries
- Joint venture partners and any other associated persons or entities

## 3. Policy Statement

Bradam strictly prohibits:

- **Bribery** in any form, including offering, promising, giving, requesting, or accepting a bribe.
- **Facilitation payments**, regardless of local customs or practices.
- **Kickbacks**, secret commissions, or any improper payments to secure business advantage.
- **Corrupt gifts, hospitality, or entertainment** intended to improperly influence decisions.

Bradam operates a **zero-tolerance approach** to bribery and corruption.

## 4. What Is Bribery?



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Bribery includes offering, promising, giving, or receiving anything of value to influence a decision or gain an unfair advantage. Examples include:

- Paying a public official to issue a construction permit faster.
- Offering a client lavish gifts to secure a contract.
- Receiving cash or gifts from suppliers to favour their tenders.

## 5. Gifts and Hospitality

Reasonable and proportionate gifts or hospitality may be permitted if:

- They are not intended to influence any decision or secure improper advantage.
- They are infrequent, transparent, and properly recorded.
- They comply with Bradam's internal limits and procedures.

**All gifts and hospitality must be approved and logged** in accordance with our internal Gifts and Hospitality Register.

## 6. Political and Charitable Contributions

- Bradam does not make political donations.
- Charitable contributions are permitted but must not be used as a cover for bribery.
- All contributions must be transparent, documented, and approved by the Managing Director.

## 7. Responsibilities

### Employees and Associated Persons Must:

- Comply with this policy at all times.
- Avoid any activity that could lead to a breach.
- Report any concerns or suspicions immediately.

### Management Must:

- Promote a culture of integrity and compliance.



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- Ensure training and communication on anti-bribery responsibilities.
- Enforce disciplinary action for non-compliance.

## 8. Due Diligence

Bradam will conduct appropriate due diligence before engaging with third parties. This includes:

- Background checks on agents, contractors, and partners.
- Assessment of risk factors such as jurisdiction, transaction size, and nature of relationship.

## 9. Reporting and Whistleblowing

Employees are encouraged to **report any concerns** related to bribery or corruption without fear of reprisal. Reports can be made via:

- Line managers
- The Compliance Officer

All reports will be investigated promptly and confidentially.

## 10. Breaches of Policy

Violations of this policy are serious and may result in:

- Disciplinary action (up to and including dismissal)
- Termination of contracts
- Referral to law enforcement

## 11. Training and Communication

Bradam provides regular training and guidance to ensure all relevant individuals understand their responsibilities under this policy.

## 12. Review and Monitoring



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This policy is reviewed annually by the Compliance Officer and approved by the Board of Directors to ensure it remains effective and aligned with legal requirements.

**Approved by:** Adam Bogard

**Position:** Director

**Date:** 22<sup>nd</sup> April 2025