

Anti-Bribery and Corruption Policy

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1 Policy statement

S4 Applications has zero tolerance for bribery and corruption. This applies equally to dealings with commercial organisations and government bodies, in the UK and anywhere else in the world.

We are bound by the UK Bribery Act 2010. It is a criminal offence to offer, give, request or accept a bribe, or to bribe a foreign public official. A company can also be guilty of failing to prevent bribery by anyone acting on its behalf. Individuals face up to 10 years in prison and an unlimited fine; companies face an unlimited fine.

We would rather lose business than win it improperly. This policy sets out what we expect and what to do if something does not look right.

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2 Scope

This policy applies to everyone who works for or represents S4 Applications: directors, employees (including family members working in the business), temporary workers, contractors, consultants, and any agent or intermediary acting on our behalf.

It covers all dealings with:

- **Commercial entities** – customers, end users, software vendors, distributors, resellers, suppliers and business partners.
- **Government entities** – central and local government, public bodies, regulators, state-owned or state-controlled companies, public international organisations, and anyone acting for them, in any country.

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3 Definitions

- **Bribe** – offering, promising, giving, requesting or accepting any advantage intended to make someone act improperly, or to reward them for doing so. It need not be cash: gifts, hospitality, discounts, rebates, jobs, favours or donations can all be bribes.
- **Corruption** – the misuse of a position of trust for private gain.
- **Public official** – anyone holding a legislative, administrative or judicial post, or working for a government, public agency, state-owned company or public international organisation, in any country. A buyer at a state-owned business counts.
- **Facilitation payment** – a small unofficial payment to speed up a routine government action, such as customs clearance or issuing a permit. These are bribes and are illegal under UK law.
- **Kickback** – a payment or benefit handed back to someone in return for awarding or influencing business.

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4 What is prohibited

You must not, directly or through anyone else:

- offer, promise or give a bribe to anyone, commercial or government, to win or keep business or gain any advantage;
- request, agree to receive or accept a bribe;
- give anything of value to a public official to influence them in their official role, even if it is local custom;
- make facilitation payments, however small;
- pay or accept kickbacks or secret commissions;
- make political donations on behalf of S4 Applications, or any charitable donation linked to a business decision;
- disguise, misdescribe or leave out any payment in our records;
- threaten or treat unfairly anyone who refuses to pay a bribe or who raises a concern.

The one exception is where someone demands payment under a threat to your safety or liberty. Your safety comes first: pay if you must, then report it to the Managing Director as soon as you are safe.

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5 Gifts, hospitality and expenses

Modest gifts and hospitality are a normal part of business and are allowed when they are:

- not intended to influence or reward a decision;
- given or received openly, never secretly;
- reasonable in value and suited to the occasion;
- never cash or cash equivalents, such as vouchers, gift cards or cryptocurrency;
- not offered while a tender, negotiation or renewal with that party is under way;
- allowed under the other party's own rules.

Anything worth more than £100 per person, given or received, needs the Managing Director's approval in advance and must be recorded in the gifts and hospitality register. If something unexpected arrives, report it within five working days.

Government entities – stricter rules. Do not give gifts of any value to public officials. Modest hospitality, such as refreshments at a meeting, needs the Managing Director's prior approval, whatever its value. Never pay a public official's travel or accommodation, and never offer hospitality to anyone involved in a live public procurement.

If you are offered something you cannot accept, decline politely. If declining would cause real offence, accept it on behalf of the company and hand it to the Managing Director.

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6 Third parties

We can be held responsible for bribes paid by agents, resellers, consultants or introducers acting for us. Before engaging one, especially where government customers or higher-risk countries are involved:

- check who they are and who owns them;
- pay only for genuine, documented services at market rates;
- never pay in cash, to a personal account, or to an account in an unconnected country;
- include anti-bribery terms in the contract where practical.

Warning signs include unusually high commissions or discounts, requests for secrecy, vague invoices, payment to a different company or country, an intermediary suggested by a public official, and reluctance to agree anti-bribery terms. If you see one, stop and speak to the Managing Director before going further.

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7 Record keeping

Keep accurate and complete records of all payments, commissions, discounts, rebates, and gifts and hospitality given or received. Expense claims need receipts and a stated business purpose. No off-the-books accounts or payments are allowed. Records are kept for at least six years.

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8 Reporting concerns

All concerns must be reported to the Managing Director, who is responsible for dealing with them. Report as soon as possible if you:

- are offered, asked for or pressured to pay a bribe;
- suspect that anyone covered by this policy has breached it;
- are unsure whether something is acceptable.

You can report in person, by phone or in writing. Do not investigate the matter yourself or confront the people involved.

The Managing Director will acknowledge the report, look into it, decide what action to take and keep a record. Where appropriate, the Managing Director will report the matter to the authorities, such as the Serious Fraud Office or the police.

If your concern involves the Managing Director, raise it with the head of Finance, or report it directly to the Serious Fraud Office. Free, confidential advice is available from the whistleblowing charity Protect.

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9 Whistleblower protection

Everyone who raises a concern or refuses to take part in bribery is protected, even if the concern turns out to be mistaken. Nobody will be dismissed, demoted, disciplined, threatened or treated less favourably as a result.

Your identity will be kept confidential as far as possible, and disclosed only with your consent or where the law requires it. Anonymous reports are accepted, though they can be harder to follow up.

Anyone who retaliates against a whistleblower, or tries to stop someone from reporting, will face disciplinary action. Workers also have legal protection under the Public Interest Disclosure Act 1998.

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10 Breaches

A breach of this policy by an employee is treated as gross misconduct and may lead to dismissal. A breach by a contractor, agent or other third party may lead to the immediate end of our contract with them. Where a crime may have been committed, the matter will be reported to the authorities.

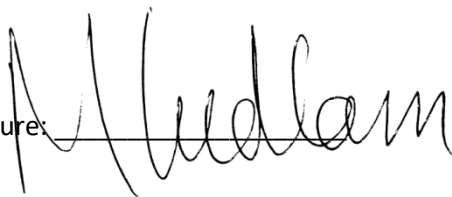
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11 Responsibility and approval

The Managing Director has overall responsibility for this policy and for dealing with any issues raised under it. Everyone covered by the policy must read it, understand it and follow it.

This policy has no fixed review cycle. The Managing Director will update it if the law changes, the business changes significantly (for example, new markets, new government customers or staff from outside the family), or an incident shows it needs to change.

Approved by: **Mat Ludlam**, Managing Director

Signature: 

Date: 28/09/26