

## ANTI-BRIBERY, FRAUD AND CORRUPTION POLICY & PROCEDURE

**Purpose:** Patrolsec Ltd is committed to the highest standards of ethical conduct and integrity in all business activities, both domestically and internationally. We maintain a zero-tolerance approach toward bribery, fraud, and corruption in any manifestation. The aim of this policy is to outline the company's approach to preventing and prohibiting bribery, fraud, and corruption in accordance with the relevant legal requirements.

**Scope:** This policy applies to all employees, directors, temporary workers, consultants, contractors, agents, and subsidiaries acting for or on behalf of Patrolsec Ltd ("associated persons") within the UK and overseas. Our senior management team is dedicated to implementing effective measures to prevent, monitor, and eliminate bribery. It is the responsibility of all employees and associated persons to assist in the prevention, detection, and reporting of bribery, corruption, and fraud.

## **Principles:**

- Patrolsec Ltd will not tolerate any form of bribery, fraud, or corruption and will conduct rigorous investigations if such occurrences are identified.
- If acts of bribery, fraud, or corruption are proven, Patrolsec Ltd will take appropriate actions and steps to recover any associated losses.
- Gifts and hospitality should adhere to the rules outlined in this policy and procedure.
- It is the responsibility of all employees and associated persons to report any reasonable suspicions of fraud or corruption, and there should be no repercussions for reporting such suspicions. Employees are encouraged to use the Patrolsec Ltd Whistle Blowing Policy for raising concerns.

[The policy continues with detailed sections on different aspects of anti-bribery and corruption, including definitions of offenses, corporate entertainment, gifts, hospitality, political and charitable contributions, declaration of interests, records, dealing with third parties, reporting, and investigating suspected issues.]

**Breaches of the Anti-Bribery, Fraud, and Corruption Policy:** Any breach of this policy may be considered gross misconduct and will be taken seriously by the company. Disciplinary action may be taken in line with the company's Disciplinary Policy and Procedure, including possible summary dismissal. The company may also report any breaches to relevant authorities for prosecution.



The Managing Director shall review this policy annually or following significant changes.

M. Nacem

Patrolsec Ltd.

Review date: 12/10/23