External Document

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1 Policy Statement

One of the Company's core values is to uphold responsible and fair business practices. It is committed to promoting and maintaining the highest level of ethical standards in relation to all its business activities. Its reputation for maintaining lawful business practices is of paramount importance and this statement is designed to preserve these values.

The Company has a zero-tolerance policy towards bribery and corruption and is committed to acting fairly and with integrity in all its business dealings and relationships by implementing and enforcing effective systems to counter bribery.

The Company's position on any form of bribery and corruption is to:

- Ensure compliance with anti-bribery laws, rules and regulations, not just within the UK but in any other country within which the Company may carry out its business or in relation to which its business may be connected.
- Enable employees and persons associated with the Company to understand the risks associated with bribery and to encourage them to be vigilant and effectively recognise, prevent and report any wrongdoing, whether by themselves or others.
- Provide suitable and secure reporting and communication channels and ensuring that any information that is reported is properly and effectively dealt with.
- Create and maintain a rigorous and effective framework for dealing with any suspected instances of bribery or corruption.

This statement applies to all permanent and temporary employees of the Company (including any of its intermediaries, subsidiaries or associated companies). It also applies to any individual or corporate entity associated with the Company or who performs functions in relation to, or for and on behalf of, the Company, including, but not limited to, directors, agency workers, casual workers, contractors, consultants, seconded staff, agents, suppliers and sponsors ("associated persons").

All employees and associated persons are expected to adhere to the Company principles and required to:

- Comply with any anti-bribery and anti-corruption legislation that applies in any jurisdiction in any part of the world in which they might be expected to conduct business.
- Ct honestly, responsibly and with integrity.
- Safeguard and uphold the Company's core values by operating in an ethical, professional and lawful manner always.

The Company recognises that industry practices may vary from country to country or from culture to culture. What is considered unacceptable in one place may be normal or usual practice in another. Nevertheless, a strict adherence to the guidelines set out in this policy is always expected of all employees and associated persons.

This statement has been written in conjunction with HybrIT internal document Anti-bribery Policy.

This statement has been approved by the Board of Directors and is made in compliance with current legislation.



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Adam Kirby CCO



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