



ASTRAL LIMITED

ANTI-BRIBERY & CORRUPTION POLICY

Issued: January 2026
Next Review: January 2027

Anti-Bribery and Corruption Policy

1. About this policy

- 1.1 It is our policy to conduct all of our business in an honest and ethical manner. We take a zero-tolerance approach to bribery and corruption and are committed to acting professionally, fairly and with integrity in all our business dealings and relationships.
- 1.2 This policy has been developed and reviewed in line with the requirements of the UK Bribery Act 2010 and reflects the Company's commitment to maintaining adequate procedures to prevent bribery.
- 1.3 Any employee who breaches this policy will face disciplinary action, which could result in dismissal for gross misconduct. Any non-employee who breaches this policy may have their contract terminated with immediate effect.
- 1.4 This policy does not form part of any employee's contract of employment and we may amend it at any time. It will be reviewed regularly.

2. Who must comply with this policy?

- 2.1 This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners.

3. What is bribery?

- 3.1 **Bribe** means a financial or other inducement or reward for action which is illegal, unethical, a breach of trust or improper in any way. Bribes can take the form of money, gifts, loans, fees, hospitality, services, discounts, the award of a contract or any other advantage or benefit.
- 3.2 **Bribery** includes offering, promising, giving, accepting or seeking a bribe.

- 3.3 All forms of bribery are strictly prohibited. If you are unsure about whether a particular act constitutes bribery, raise it with your line manager or Director.
- 3.4 The Company ensures compliance with anti-bribery and corruption laws through clear policies, employee awareness, director oversight, record-keeping requirements, and enforcement of disciplinary measures for breaches.
- 3.5 Specifically, you must not:
- (a) give or offer any payment, gift, hospitality or other benefit in the expectation that a business advantage will be received in return, or to reward any business received;
 - (b) accept any offer from a third party that you know or suspect is made with the expectation that we will provide a business advantage for them or anyone else;
 - (c) give or offer any payment (sometimes called a facilitation payment) to a government official in any country to facilitate or speed up a routine or necessary procedure;
- 3.6 You must not threaten or retaliate against another person who has refused to offer or accept a bribe or who has raised concerns about possible bribery or corruption.

4. Fraud and Malpractice

- 4.1 The Company is committed to preventing, detecting and responding to fraud and malpractice. Controls include financial oversight, segregation of duties, accurate record-keeping, internal approval processes, and regular management review. Any suspected fraud or malpractice must be reported immediately in accordance with this policy and the Company's Whistleblowing Policy.

5. Competition Law

- 5.1 The Company is committed to complying with all applicable competition and antitrust laws. Employees and representatives must not engage in price-fixing, bid-rigging, market sharing, or any other anti-competitive practices.
- 5.2 The Company seeks to prevent anti-competitive behaviour through management oversight, ethical standards, accurate record-keeping, and clear reporting

mechanisms. Any concerns regarding potential anti-competitive conduct must be reported immediately

6. Gifts and hospitality

- 6.1 This policy does not prohibit the giving or accepting of reasonable and appropriate hospitality for legitimate purposes such as building relationships, maintaining our image or reputation, or marketing our products and services.
- 6.2 A gift or hospitality will not be appropriate if it is unduly lavish or extravagant, or could be seen as an inducement or reward for any preferential treatment (for example, during contractual negotiations or a tender process).
- 6.3 Gifts must be of an appropriate type and value depending on the circumstances and taking account of the reason for the gift. Gifts must not include cash or cash equivalent (such as vouchers), or be given in secret. Gifts must be given in our name, not your name.
- 6.4 Promotional gifts of low value such as branded stationery may be given to or accepted from existing customers, suppliers and business partners.

7. Record-keeping

- 7.1 You must declare and keep a written record of all hospitality or gifts given or received. You must also submit all expenses claims relating to hospitality, gifts or payments to third parties in accordance with our expenses policy and record the reason for expenditure.
- 7.2 All accounts, invoices, and other records relating to dealings with third parties including suppliers and customers should be prepared with strict accuracy and completeness. Accounts must not be kept "off-book" to facilitate or conceal improper payments.

8. How to raise a concern

- 8.1 If you are offered a bribe, or are asked to make one, or if you suspect that any bribery, corruption or other breach of this policy has occurred or may occur, you

must notify your manager or Director or report it in accordance with our Whistleblowing Policy as soon as possible.

- 8.2 All reports will be taken seriously and investigated promptly, confidentially and impartially. Where appropriate, disciplinary action, contractual remedies or referral to law enforcement authorities may follow. This applies equally to concerns relating to bribery, corruption or anti-competitive behaviour.
- 8.3 The Company Director has overall responsibility for this policy and acts as the designated point of contact for any concerns relating to bribery or corruption.
- 8.4 This policy applies to all suppliers, contractors and business partners acting on behalf of the Company, who are expected to uphold equivalent standards.

Signed:

A handwritten signature in black ink, appearing to read 'P. Houghton', written over a light blue horizontal line.

Paul Houghton, Director

Date: 01 January 2026