

#### Anti-Bribery Policy

#### Introduction:

Hard Anodising Surface Treatments Limited is committed to maintaining the highest standards of business ethics and integrity. This Anti-Bribery Policy outlines our stance against bribery and corrupt practices and provides guidelines for our employees, clients, partners, and stakeholders to ensure compliance with anti-bribery laws and regulations.

## Policy Statement:

- Zero Tolerance: We have a zero-tolerance approach to bribery and corrupt practices in all our operations and dealings. We prohibit giving, offering, requesting, or receiving bribes, kickbacks, facilitation payments, or any undue advantage.
- Applicability: This policy applies to all employees, contractors, consultants, agents, partners, suppliers, and anyone associated with Hard Anodising Surface Treatments Limited.

# Key Principles:

- **Prohibition**: We prohibit the offering, giving, soliciting, or receiving of any form of bribe, whether direct or indirect, to obtain or retain business or gain any improper advantage.
- Gifts and Hospitality: While legitimate gifts, entertainment, and hospitality are acceptable in the context of business relationships, they must not create an obligation or influence decision—making. Any gifts or hospitality must be modest, appropriate, transparent, and compliant with local laws.

- Third Parties: We take measures to prevent bribery by third parties acting on our behalf. We conduct thorough due diligence on partners, suppliers, agents, and other intermediaries.
- Political Contributions: We do not make political contributions or donations that could be interpreted as an attempt to gain a business advantage improperly.

## Responsibilities:

- Employees: All employees are responsible for understanding and adhering to this policy. Any employee who suspects or witnesses a breach of this policy must report it promptly.
- Management: Management is responsible for implementing and promoting this policy, providing guidance, and ensuring its effectiveness. They must also promptly address reported concerns.

## Consequences of Non-Compliance:

Non-compliance with this Anti-Bribery Policy can lead to disciplinary action, including termination of employment, contract termination, legal action, and damage to the reputation of the company.

# Reporting Concerns:

We encourage employees, clients, partners, and stakeholders to report any concerns related to bribery, corruption, or violations of this policy through the appropriate channels without fear of retaliation.

#### Conclusion:

Hard Anodising Surface Treatments Limited is committed to upholding ethical business practices and conducting its operations with honesty, transparency, and integrity. This Anti-Bribery Policy demonstrates our dedication to preventing bribery and corruption and maintaining the trust of our employees, clients, partners, and the communities we serve.

Director