



Anti-Bribery and Corruption Policy

Contents	
General.....	2
Bribery and Corruption.....	2
Definition.....	2
Scope.....	2
Responsibilities.....	3
Giving Gifts, Gratuities and Hospitality.....	3



General

At Sustainable Tech 4 Good Ltd and Veritas Digital Services Ltd, herein ST4G/VDS, we appreciate the importance of ethical behaviour and we are proud of our high ethical standards, but we cannot be complacent about the threat of bribery and corruption in our business. Our first business principle deals with 'integrity in corporate conduct' which commits us to implement anti-corruption policies and procedures.

Our second business principle 'ensuring openness and transparency' commits us never to engage in bribery, any form of unethical inducement or payment including facilitation payments and 'kickbacks'. This policy is part of those commitments.

Bribery and Corruption

The UK Bribery Act 2010 creates offences and penalties for bribery and corruption. It creates a corporate offence of failure to prevent bribery and requires ST4G/ VDS to implement 'adequate procedures' to prevent bribery.

This policy sets out the responsibilities of ST4G/VDS employees and ST4G/VDS businesses in preventing bribery and corruption and how we will implement 'adequate procedures' to do so.

Definition

For the purposes of this policy, bribery occurs when one person offers, pays, seeks or accepts a payment, gift, favour, or a financial or other advantage from another to influence a business outcome improperly, or to induce or reward improper conduct.

Bribery and corruption – whether involving government officials, or commercial entities, including joint ventures – can be direct or indirect through third parties like agents, brokers and joint venture partners. It includes facilitation payments even though in some countries facilitation payments are legal.

Scope

Under the UK Bribery Act 2010, ST4G/VDS is required to put procedures in place to prevent bribery by any individual or organisation that performs services for or on behalf of ST4G/VDS. Consequently, this



policy applies to every employee, contractor, director and officer in every wholly-owned ST4G/VDS company and in every joint venture company under ST4G/VDS control.

Contractors, consultants or suppliers who are ST4G/VDS agents or who are working on our behalf or in the name of ST4G/VDS, through outsourcing of services, processes or any business activity, will be required to act consistently with this policy when acting on our behalf.

Independent contractors, consultants or suppliers will be made aware of this policy as it applies to our employees in their dealings with them. Our responsible procurement and supplier management policy will also continue to apply to suppliers.

Responsibilities

Directors:

Have a legal responsibility to make sure fraud and corruption are prevented, detected and investigated. Combating fraud and corruption including bribery requires an understanding of how and why it happens, the ways in which it can be minimised and how to professionally investigate.

All Employees

All employees, contractors, directors and suppliers acting on behalf of ST4G/VDS are individually responsible for conforming to the rules and regulations contained in ST4G/VDS's Anti Bribery and Corruption Policy.

Any offers of gifts or hospitality, which are in any way related to their duties, must be discussed by the employee with management.

All employees, contractors, directors and suppliers acting as agents on behalf of ST4G/VDS must declare any possible conflicts of interest which they may have in contracts. When an employee suspects that there has been fraud, corruption or bribery, they must report the matter to the Head of Finance.

Giving Gifts, Gratuities and Hospitality

ST4G/VDS will never provide gifts or hospitality with the intention of influencing anyone to act improperly or of influencing a public official in the performance of their duties.

Our policy does not prohibit giving promotional or personal gifts of low value or extending appropriate hospitality, provided that such gifts and hospitality are given to indicate regard for the individual in question and for the business relationship rather than to induce them to act improperly.



As a very general guide, gifts to individuals should not normally have a value in excess of £50. Hospitality should involve sharing (as opposed to gifting or providing) good quality food and drink but should not be lavish or extravagant in the local context.

ST4G/VDS does not tolerate any form of bribery or corruption. You must not offer, pay, make, seek or accept a personal payment, gift or favour in return for favourable treatment or to gain any business advantage. You must follow the anti-bribery and corruption laws to which you and ST4G/VDS are subject,, remembering that the UK laws still apply wherever you are operating.

You are liable to disciplinary action, dismissal, legal proceedings and possibly imprisonment if you are involved in bribery and corruption.

You must ensure people who work for and with you understand bribery and corruption is unacceptable. You must comply with ST4G/VDS procedures for the prevention of bribery and corruption.

ST4G/VDS shall regularly and systematically identify bribery and corruption risks in its business and implement adequate risk-based procedures aimed at preventing bribery and corruption from occurring, including:

Communication – We will communicate this policy and relevant guidance to employees across the Group, through our established internal communication channels. We will also communicate this policy to our suppliers, contractors and business partners and wider stakeholders.

Training – We will ensure that those within the scope of the policy receive training appropriate to their activities and the associated risks.

Books and records – We will maintain adequate books and records which properly and fairly document all financial transactions. We will maintain written evidence to record compliance with this policy.

Audit – Our internal control systems will be subject to regular internal and independent audits to provide assurance that they are effective in countering bribery and corruption.

Mergers and acquisitions – Through due diligence we will prevent the acquisition of bribery and corruption related liabilities.

Business relationships – We will ensure that our business partners –including contractors, suppliers, agents, brokers and joint venture partners –are fit to do business with.

Supply chain – We will address bribery and corruption risk in our supply chain including by ensuring that payments made for goods and services are reasonable.

Conflicts of interest – Gifts and hospitality – We will address conflicts of interest and the risks created by gifts and hospitality through the implementation of our internal policies.

The Policy will be reviewed and developed periodically to ensure it remains effective and any necessary amendments will be communicated to all employees.



ST4G-VDS
Anti-Bribery and Corruption Policy

Approved By: Paul Gregg

Date: 29th November 2019

Reviewed: 27th January 2026