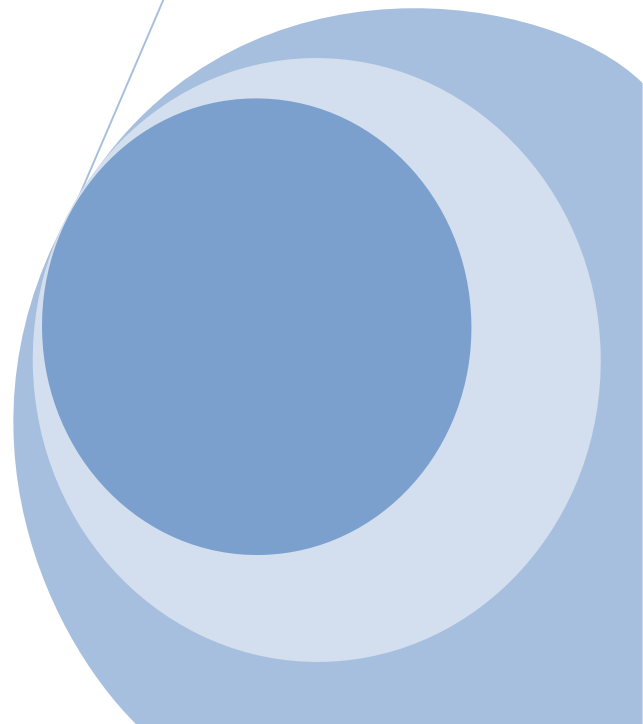
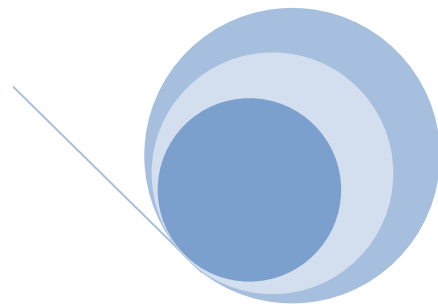
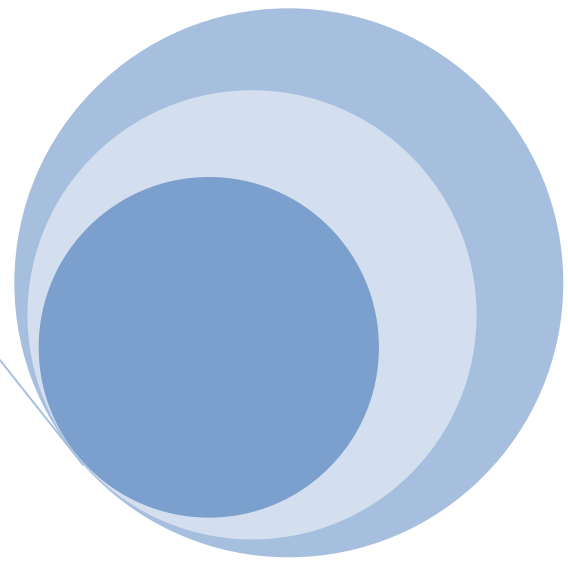




ANTI BRIBARY POLICY

MAY 2023



## MISSION STATEMENT

MPR IT Solutions Ltd. recognise its responsibilities under the Bribery Act 2010 and other similar legislation.

The Company is committed to running a professional business free from discreditable behaviour of any kind.

It is particularly committed to Principle 2 of the Guidance given under the Bribery Act by the Ministry of Justice, that is, to prevent bribery by persons associated with it.

## COMPLIANCE POLICY, PRACTICES AND PROCEDURES

It is an offence under section 7 of the Bribery Act 2010 for a “relevant commercial organisation”, such as our Company, to fail to prevent bribery. In this context it is liable if a person associated with it (a director, an employee, an agent) commits an act of bribery whether that person is prosecuted or not. It is, however, a defence to any such criminal allegation to show, on a balance of probabilities, that the organisation, nevertheless, had adequate procedures in place to prevent persons associated with it from being involved in bribery. In order to prevent the unwitting engagement in behaviour which might raise the suspicion of bribery and to prevent any associated person purporting to act on its behalf in a manner that brings suspicion on the directors and employees, the following measures have been adopted as appropriate and proportionate to the risks faced.

They will be enforced by their dissemination and disciplinary measures. Any resources that are required to implement any compliance measures are to be made available.

## MANAGEMENT

The responsibility for compliance of this policy rests with the Company Directors who will oversee, make assessments of risk, deal with decisions where potential for bribery exists, receive and investigate reports of bribery and supervise the measures put in place to prevent bribery.

Under no circumstances should a person who reports a suspicion of bribery be subject to victimisation for making a bon fide report, whether the suspicion turns out to be justified or not.

## ASSESSMENT OF RISK

The Directors are governed by a strict code of conduct and the employees act upon instructions and are chosen for their integrity as well as ability. As such the general assessment of the risk of committing an offence under the Act is very low. The risk of falling foul of a section 6 offence, of bribing a foreign official or of extra-territorial offences does not arise.

However:

In relation to occasions on which hospitality is offered or accepted by Directors or employees, issues may arise as to the line between a proper public relations exercise and intention to induce improper performance of a relevant function.

In relation to awarding of contracts for services the Company has provisions for competitive tendering in place. However, as an additional requirement and as a requirement in awarding contracts which are not required to go out to tender, an issue of bribery might arise.

In relation to charitable and political donations care should be exercised to avoid the suggestion of soliciting favours.

The assessment of the firm's exposure to external and internal risks of bribery will be assessed annually.

## HOSPITALITY

In relation to hospitality, promotional expenditure which seeks to improve the image of the Company, to establish cordial and professional relationships and to maintain them is not unlawful if it is reasonable and proportional.

In order to make an assessment of any particular hospitality event which is to be offered to a client or prospective client the Commercial Director will have to be supplied with information. This will include the cost and nature of the hospitality, the name, and details of the person to be entertained and the purpose of the event. He will be required to approve the event or make suggestions for modifying it.

In the event a director or employee is invited to an event a similar procedure should be followed.

## CONTRACTS WITH CLIENTS

No fees over and above proper professional fees agreed in advance for professional work done may be accepted.

No payment may be made to the client for the award of a contract for services.

## SUBCONTRACTING

In subcontracting work no fee should be sought or accepted for awarding a contract to a subcontractor.

## THIRD PARTIES

A third-party sub-contractor should be engaged to act on behalf of MPR IT Solutions Ltd. in a manner consistent with this policy. The terms of engagement should be written down and refer to this policy.

Due diligence checks carried out by the Company on prospective sub-contractors ought to include, where appropriate, an assessment of their ethical conduct.

## CHARITABLE AND POLITICAL DONATIONS

Donations of a charitable or political nature must be approved by a full Director's meeting and be subject to a prior audit to ensure that there can be no suspicion that any advantage could be thought to accrue to the firm or any of its Directors or employees.

## COMMUNICATION

A copy of this policy will be available on the public area of the Company's website. Reference will be made to it in the client care documents provided to clients, contracts with suppliers and agents.

## TRAINING

Where deemed necessary staff employed by MPR IT Solutions Ltd. and the Directors themselves will be required to undergo regular training in the terms of the Bribery Act and the requirements described in this document.

Any director or member of staff should be able to approach the HR Director in absolute confidence in order to receive advice as to their conduct or to report a matter to concern which relates to bribery.

This policy will be reviewed annually for its continued effectiveness and suitability.