

Interflon Scotland Ltd Anti-Corruption and Anti-Bribery Policy

Last Reviewed: 05/03/25

Next Review: 05/03/26

Mission Statement

Interflon Scotland Ltd recognises that ethical business conduct is fundamental to our organisation, our team, and our customers. We are committed to conducting all business activities with absolute integrity and fairness, and we will not tolerate any activities involving bribery or corruption.

We recognise our responsibility to maintain the highest standards of business ethics, including meeting all legal and regulatory requirements. We are committed to preventing, detecting, and addressing corruption and bribery as an integral part of our organisation strategy and operating methods, with regular review points. We will encourage our team, clients and other stakeholders to do the same.

Objectives, Targets and Priority Actions

1. Zero Tolerance for Bribery and Corruption

Target: Zero incidents of bribery or corruption

- We will maintain absolute integrity across all our operations and will not tolerate any activities involving bribery or corruption.
- We will ensure all team members understand their responsibilities in preventing, detecting, and reporting suspected bribery or corruption.
- We will provide clear guidance on recognising and addressing bribery and corruption, whether in the UK or overseas.

2. Transparent Gift and Hospitality Management

Target: 100% compliance with gift and hospitality procedures

- We will maintain written records of all gifts and hospitality given or received.
- We will ensure prior management approval is obtained for all gifts and hospitality.
- We will ensure all gifts and hospitality are appropriate, reasonable, and comply with our policy guidelines.
- We will prohibit all kickbacks and facilitation payments.

3. Robust Reporting and Response Systems

Target: All suspected incidents reported and investigated within 30 days

- We will encourage and facilitate the reporting of any suspected bribery or corruption.
- We will ensure no team member suffers retaliation for refusing to participate in bribery or corruption or for raising concerns in good faith.
- We will investigate all reports thoroughly and take appropriate action where necessary.

4. Team Education and Awareness

Target: All team members trained annually on anti-corruption policies

- We will ensure all team members, contractors, and consultants understand this policy and their obligations.
- We will provide regular discussion and training on recognising and preventing bribery and corruption.
- We will maintain awareness of legal requirements and potential penalties.

5. Accurate Record Keeping and Financial Controls

Target: 100% accurate and complete financial records

- We will maintain accurate and complete records of all third-party dealings, including customers and suppliers.
- We will ensure all expenses claims provide full details and justification.
- We will prohibit 'off-book' accounts or any attempts to conceal payments.

Governance and Engagement

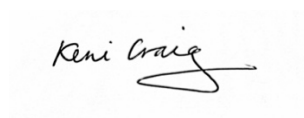
The directors will monitor and implement an action plan to ensure delivery of the objectives and targets above, with regular review of progress.

All team members will be made aware of our anti-corruption objectives and actions. As a small business, we will discuss these matters regularly in team meetings.

Any breach of this policy may result in disciplinary action up to and including dismissal for gross misconduct. Team members should be aware that bribery and corruption are criminal offences that may result in up to 10 years' imprisonment, and the Company may face unlimited fines and exclusion from public contract tenders.

We will update this policy at least annually in consultation with staff and other stakeholders where necessary.

Signed

A handwritten signature in black ink, reading "Keri Craig", with a stylized flourish at the end.

Keri Craig
Director
5 March 2025



Interflon Scotland Ltd.