

ANTI-BRIBERY POLICY

Conducting business honestly, fairly and with integrity



Wavepoint Group Limited — Our zero-tolerance commitment to preventing bribery and corruption

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Approved by	Jason Alexander, Managing Director	Applies to	All staff, contractors & third parties

OUR ANTI-BRIBERY PRINCIPLES AT A GLANCE



**Honest &
Ethical**



**Zero
Tolerance**



**Gifts &
Hospitality**



**Accurate
Records**



**Speak
Up**

In this policy, “the Company”, “we” and “us” refer to Wavepoint Group Limited.

1. Policy Statement

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, wherever we operate. We are committed to implementing and enforcing effective systems to counter bribery, and to upholding all laws relevant to countering bribery and corruption, including the Bribery Act 2010.

2. Who is Covered by this Policy

This policy applies to all individuals working at all levels and grades, including senior managers, directors, employees (whether permanent, fixed-term or temporary), consultants, contractors, trainees, agency workers, volunteers, agents and any other person providing services to us or acting on our behalf, wherever located.

3. What is Bribery?

A bribe is a financial or other advantage offered, promised, given, requested or accepted to induce or reward the improper performance of a function or activity, or to influence a public official in the performance of their duties. Under the Bribery Act 2010 there are four key offences:

- offering, promising or giving a bribe to another person;

- requesting, agreeing to receive or accepting a bribe from another person;
- bribing a foreign public official; and
- the corporate offence of failing to prevent bribery by persons associated with the organisation.

Individuals found guilty of bribery can face imprisonment and unlimited fines, and the Company can face an unlimited fine and serious reputational damage.

4. Gifts and Hospitality

This policy does not prohibit normal and appropriate hospitality, or the giving and receiving of promotional gifts of low value, given or received to build or maintain good business relationships. However, gifts and hospitality must never be offered or accepted with the intention of persuading anyone to act improperly, or to influence a public official. Gifts and hospitality must be of an appropriate type and value, given openly, recorded, and must comply with the Company's ethics and expenses procedures. If you are in any doubt, seek approval from a director before offering or accepting.

5. Facilitation Payments and Kickbacks

We do not make, and will not accept, facilitation payments or "kickbacks" of any kind.

- Facilitation payments are typically small, unofficial payments made to secure or expedite a routine action by a government official.
- Kickbacks are typically payments made in return for a business favour or advantage.
- All staff must avoid any activity that might lead to, or suggest, that a facilitation payment or kickback will be made or accepted by us.

6. Donations

- We do not make contributions of any kind to political parties.
- We only make charitable donations that are legal and ethical, and never make charitable donations for the purpose of gaining any commercial advantage.

7. Our Responsibilities and Preventative Procedures

The prevention, detection and reporting of bribery is the responsibility of everyone covered by this policy. We base our procedures on the six principles for adequate procedures published by the Ministry of Justice under the Bribery Act 2010:

- Proportionate procedures — measures proportionate to the bribery risks we face and the nature of our business;
- Top-level commitment — directors and senior management foster a culture in which bribery is never acceptable and lead by example;
- Risk assessment — we assess our exposure to bribery risks, including in new markets and third-party relationships;
- Due diligence — we apply appropriate due diligence to those who perform or will perform services for or on our behalf;
- Communication and training — this policy is communicated to staff and relevant third parties, with training provided as appropriate; and
- Monitoring and review — we monitor and review our procedures and make improvements where needed.

All staff must ensure that they read, understand and comply with this policy, and must avoid any activity that might lead to, or suggest, a breach of it.

8. Record Keeping

- We keep financial records and have appropriate internal controls in place that evidence the business reason for payments made to third parties.
- All expense claims relating to hospitality, gifts or expenses incurred for third parties must be submitted in accordance with our expenses policy and specifically record the reason for the expenditure.
- All accounts, invoices and other documents and records relating to dealings with third parties must be prepared and maintained with strict accuracy and completeness.
- No accounts may be kept “off-book” to facilitate or conceal improper payments.

9. Raising Concerns

All staff are encouraged to raise concerns about any issue or suspicion of malpractice at the earliest possible stage. If you are offered a bribe, are asked to make one, suspect that bribery has occurred or may occur, or have any other concern, you should notify a director or raise it under the Company’s Whistleblowing Policy.

No one will suffer demotion, penalty, dismissal or any other detriment for refusing to take part in bribery, or for raising a genuine concern in good faith — even if it turns out to be mistaken. We encourage openness and will support anyone who raises genuine concerns.

10. Monitoring and Review

- The effectiveness of this policy is reviewed regularly by the Board.
- Internal control systems and procedures are subject to review under our internal audit process.
- This policy is reviewed at least annually, and updated when legislation, guidance or circumstances change.

Approved and signed on behalf of Wavepoint Group Limited



Signed	Jason Alexander
Position	Managing Director (Employer)
Date	24 June 2026
Review date	24 June 2027

— End of Anti-Bribery Policy —