

Quantinuum Anti-Corruption and Anti-Bribery Commitment

Our Commitment

At Quantinuum, we are committed to conducting business with the highest standards of integrity and ethics. We maintain a strict zero-tolerance approach to bribery and corruption in all our business dealings worldwide.

Policy Highlights

Legal Compliance

We adhere to all applicable anti-corruption and anti-bribery laws, including the UK Bribery Act (UKBA) and the US Foreign Corrupt Practices Act (FCPA), as well as local anti-corruption laws in all jurisdictions where we operate.

Prohibited Conduct

Our policy prohibits:

- Offering, promising, or giving anything of value to improperly influence business decisions
- Commercial bribery in both the public and private sectors
- Facilitation payments of any kind
- Indirect payments through third parties that would otherwise violate our policy or applicable law

Third-Party Relationships

We hold our business partners, agents, consultants, and other third parties to the same high ethical standards we set for ourselves. We conduct appropriate due diligence on third parties and require their compliance with anti-corruption laws.

Transparent Business Practices

We maintain accurate books and records that fairly reflect all transactions and asset dispositions. We are committed to transparency in our financial reporting and business operations.

Reporting Concerns

We encourage the reporting of any suspected violations of our anti-corruption policy. Reports can be made to our [Chief Compliance Officer](#) or through our [confidential reporting channels](#) without fear of retaliation.

Our Expectation

Integrity is non-negotiable at Quantinuum. We expect all employees, officers, directors, contractors, consultants, representatives, and business partners to uphold these principles in every business interaction.