

**UTS**

United Tooling Solutions

Anti Bribery and Corruption Policy

Policy Statement

United Tooling Solutions Ltd (UTS) is committed to conducting business in an ethical and honest manner and is committed to implementing and enforcing systems that ensure bribery is prevented. We have zero-tolerance for bribery and corrupt activities and are committed to acting professionally, fairly, and with integrity in all business dealings and relationships.

This anti-bribery policy applies to all employees (whether temporary, fixed-term, or permanent), consultants, contractors, trainees, seconded staff, home workers, casual workers, agency staff, volunteers, or any other person or persons associated with us (including third parties such as suppliers and sponsors).

A bribe is defined as an inducement or reward offered, promised, or provided to gain any commercial, contractual, regulatory or personal advantage. Bribery is not limited to the act of offering a bribe. If an individual is on the receiving end of a bribe and they accept it, they are also breaking the law.

Company Responsibilities

The company is committed to:

- upholding all UK legislation relevant to countering fraud, bribery and corruption, including the Bribery Act 2010 in the UK and abroad.
- ensuring overseas supplier training and visits are completed to comply with the above legislation (infrequent activity)
- operating a framework for the prevention and detection of fraud, bribery and corruption.
- requiring that employees and persons working on our behalf always act with honesty, integrity, propriety and due care in all matters.
- strictly prohibiting and not tolerating fraud, acts of bribery or any other form of corrupt behaviour
- ensuring by appropriate due diligence that those it does business with share the culture of intolerance to fraud, bribery and corruption
- remaining alert to the risk of fraud, bribery and other irregularities both within the organisation and in organisations with which the company contracts and reports any matters of potential concern
- recognising that signs of fraud, bribery and corruption in the organisation and/or its supply chain
- could be an indication of other illegal or unethical activity, such as modern slavery and/or human trafficking
- promoting an open, honest and questioning culture which encourages propriety and vigilance amongst all personnel
- taking seriously any breach of this Policy, which may ultimately lead to dismissal via the Company

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disciplinary procedure, or for non-employees may result in permanent removal from UTS sites, and/or be subject to the involvement of the police and judicial system in the event of any criminal activity

- recovering losses associated with breach of this Policy
- constantly upholding all laws relating to anti-bribery and corruption in all the jurisdictions in which we operate. We are bound by the laws of the UK, including the Bribery Act 2010, regarding our conduct both at home and abroad

Employee Responsibilities

As an employee of UTS you must ensure that you read, understand, and comply with the information contained within this policy and company handbook.

All employees and those under our control are equally responsible for the prevention, detection, and reporting of bribery and other forms of corruption. They are required to avoid any activities that could lead to, or imply, a breach of this anti-bribery policy.

If you have reason to believe or suspect that an instance of bribery or corruption has occurred or will occur in the future that breaches this policy, you must notify the HR manager.

If any employee breaches this policy, they may face disciplinary action and could face dismissal for gross misconduct. UTS has the right to terminate a contractual relationship with an employee if they breach this anti-bribery policy.

Gifts and Hospitality

The words "gifts" and "hospitality" have wide meanings, and no conclusive definition is possible. Gifts and hospitality include: the gift of any goods or services; the opportunity to acquire any goods or services free of charge or at a discount or at terms not available to the general public; and the offer of food, drink, accommodation or entertainment or the opportunity to attend any cultural or sporting event.

UTS accepts normal and appropriate gestures of hospitality and goodwill (whether given to/received from third parties) so long as the giving or receiving of gifts and hospitality meets the following requirements:

- It is not made with the intention of influencing the party to whom it is being given, to obtain or reward the retention of a business or a business advantage, or as an explicit or implicit exchange for favours or benefits.
- It is not made with the suggestion that a return favour is expected.
- It is in compliance with local law.
- It is given in the name of the company, not in an individual's name.
- It does not include cash or a cash equivalent (e.g. a voucher or gift certificate).
- It is appropriate for the circumstances (e.g. giving small gifts around Christmas or as a small



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thank you to a company for helping with a large project upon completion).

- It is of an appropriate type and value and given at an appropriate time, taking into account the reason for the gift.
- It is given/received openly, not secretly.
- It is not selectively given to a key, influential person, clearly with the intention of directly influencing them.
- It is not above a certain excessive value, as pre-determined by the company's financial director (usually in excess of £50), if hospitality or a gift is received in excess of £50 it must be reported to the financial director.
- It is not offered to, or accepted from, a government official or representative or politician or political party, without the prior approval of the company's financial director.
- All gifts and hospitality must be logged along with the source, a log/register of these will be kept.
- All gifts received will be raffled for UTS employees.

Where it is inappropriate to decline the offer of a gift (i.e. when meeting with an individual of a certain religion/culture who may take offence), the gift may be accepted so long as it is declared to the financial director, who will assess the circumstances.

UTS recognises that the practice of giving and receiving business gifts varies between countries, regions, cultures, and religions, so definitions of what is acceptable and not acceptable will inevitably differ for each.

Political Contributions

UTS will not make donations, whether in cash, kind, or by any other means, to support any political parties or candidates. We recognise this may be perceived as an attempt to gain an improper business advantage.

Charitable Contributions

UTS accepts (and indeed encourages) the act of donating to charities - whether through services, knowledge, time, or direct financial contributions (cash or otherwise) - and agrees to disclose all charitable contributions it makes, upon request. Employees must be careful to ensure that charitable contributions are not used to facilitate and conceal acts of bribery. We will ensure that all charitable donations made are legal and ethical under local laws and practices, and that donations are not offered/made without the approval of the compliance manager.

How to Raise a Concern

If you suspect that there is an instance of bribery or corrupt activities occurring in relation to UTS you are encouraged to raise your concerns at as early a stage as possible. If you're uncertain about whether a certain action or behaviour can be considered bribery or corruption, you should speak to your line manager.



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What to do if you are a Victim of Bribery or Corruption

You must tell the HR manager as soon as possible if you are offered a bribe by anyone, if you are asked to make one, if you suspect that you may be bribed or asked to make a bribe in the near future, or if you have reason to believe that you are a victim of another corrupt activity.

SIGNED:

Chris Taylor

DATE: 12/2/2025