

## **Anti-Bribery and Corruption Policy**

### **1. Policy Statement**

Converse360 Ltd is committed to conducting business ethically, transparently and in full compliance with the UK Bribery Act 2010. We operate a zero-tolerance approach to bribery and corruption in all forms.

This policy applies to all employees, directors, contractors, consultants, and any third parties acting on behalf of Converse360 Ltd, including resellers, partners and agents.

### **2. Scope**

This policy applies to all business activities undertaken by Converse360 Ltd within the United Kingdom and in any other jurisdictions in which we operate. It covers interactions with:

- Customers and prospective customers
- Public sector organisations
- Suppliers and service providers
- Resellers, partners and intermediaries

### **3. What is Bribery?**

Bribery includes offering, promising, giving, requesting or accepting any financial or other advantage with the intention of influencing a person's actions or decisions improperly.

This includes:

- Cash payments or equivalents
- Gifts, hospitality or entertainment
- Discounts, commissions or incentives
- Any other benefit intended to gain an unfair advantage

Facilitation payments (small payments made to secure or speed up routine actions) are not permitted under UK law and are strictly prohibited.

### **4. Prohibited Conduct**

No person acting on behalf of Converse360 Ltd may:

- Offer or give a bribe to any individual or organisation
- Request or accept a bribe
- Use third parties (e.g. resellers or partners) to make improper payments on our behalf
- Engage in any activity that could be perceived as improperly influencing a business decision

This applies equally to dealings with private sector organisations and public officials.

## **5. Gifts and Hospitality**

Converse360 Ltd recognises that reasonable and proportionate gifts and hospitality can be part of normal business relationships.

However, such gifts and hospitality must:

- Be reasonable, proportionate and infrequent
- Not be intended to influence a business decision
- Be appropriate to the circumstances and transparent
- Not be offered or accepted during active procurement or tender processes

As a general guideline:

- Low-value items (e.g. modest meals, branded items) are acceptable
- High-value or frequent gifts should be avoided or approved in advance

If there is any doubt, individuals should seek guidance from the Director.

## **6. Third Parties, Resellers and Partners**

Converse360 Ltd works with resellers and partners to deliver its services. We expect all third parties acting on our behalf to adhere to the same ethical standards set out in this policy.

We will:

- Perform appropriate due diligence on partners and resellers
- Include anti-bribery provisions in contracts
- Monitor relationships where appropriate

Any third party found to be engaging in bribery or corruption may have their agreement terminated.

## **7. Reporting Concerns**

All employees, partners and third parties are encouraged to report any concerns or suspected breaches of this policy. Reports can be made to:

[finance@converse360.co.uk](mailto:finance@converse360.co.uk)

Reports will be treated confidentially, and no individual will suffer retaliation for raising a genuine concern in good faith.

## **8. Responsibilities**

Overall responsibility for this policy rests with:

Richard Brown (Managing Director) Converse360 Ltd

The Director is responsible for:

- Ensuring the policy is implemented and maintained

- Reviewing compliance
- Taking appropriate action where breaches occur

All individuals working with Converse360 Ltd are responsible for:

- Understanding and complying with this policy
- Acting with integrity in all business dealings

### **9. Breaches and Enforcement**

Any breach of this policy may result in:

- Disciplinary action
- Termination of employment or contract
- Termination of partner or reseller agreements
- Potential legal action

### **10. Review**

This policy will be reviewed periodically and updated as necessary to reflect changes in legislation, business activities or risk profile.