

CLOSEDAY LTD

ANTI-BRIBERY POLICY

Effective from: February 1, 2026

Our commitment

Closeday Ltd (**Closeday**) is a UK-based insolvency practice. We take a zero-tolerance approach to bribery and corruption. We conduct our business honestly and in compliance with the **Bribery Act 2010**, and we expect the same of everyone who works with us.

Who this applies to

This policy applies to all directors, employees, contractors, consultants, and anyone performing services for or on behalf of Closeday.

What we prohibit

Bribery and kickbacks. No one acting for Closeday may offer, promise, give, request or accept a bribe in any form - including kickbacks to secure contracts, referrals or commercial advantages.

Facilitation payments. The Bribery Act makes no exception for payments to expedite routine government actions. Neither do we.

Gifts and hospitality. Modest, proportionate hospitality in the ordinary course of business can be acceptable, but we actively avoid or minimize it. Gifts or hospitality must never be offered or accepted during a competitive process, and cash or cash equivalents are always prohibited.

Political contributions. Closeday does not contribute to political parties, campaigns or individual politicians. Charitable donations are permitted where transparent, approved by a director, and not connected to obtaining business.

Third parties

Closeday may be liable for bribery committed by people acting on our behalf. We conduct proportionate due diligence on agents, referral partners and other intermediaries, and our contracts include anti-bribery obligations.

Raising concerns

Anyone who suspects bribery or corrupt conduct connected with our business should report it to our Compliance Officer. We will not tolerate retaliation against anyone who raises a concern in good faith. All reports are treated confidentially to the extent permitted by law.

Consequences

Breach of this policy may result in disciplinary action up to and including dismissal, termination of a business relationship, and referral to relevant authorities. No one will be penalised for refusing to pay a bribe - even if it costs us business.

Review

This policy is owned, enforced and regularly reviewed by the Compliance Officer.