

HUBFORT

ANTI-BRIBERY AND CORRUPTION POLICY

Policy Title	Anti-Bribery and Corruption Policy
Document Owner	Managing Director, HUBFORT
Applies To	All employees, contractors, directors and agents of HUBFORT
Effective Date	16 April 2026
Version	1.0
Review Cycle	Annual
Jurisdiction	United Kingdom

1. Purpose

This is HUBFORT's overarching anti-bribery and corruption policy. It sets out the company's zero-tolerance position, the legal framework, and the controls that apply across all related policies including Gifts, Entertainment, Facilitation Payments, Business Meals, Charitable Contributions, and Political Contributions.

2. Scope

This policy applies to all employees, directors, contractors, consultants, agents, intermediaries, and any third party acting for or on behalf of HUBFORT, worldwide. It applies regardless of seniority, location, or local business custom.

3. Policy Statement

HUBFORT has zero tolerance for bribery and corruption. We do not offer, give, request, or accept bribes in any form, and we will not work with parties who do. We commit to acting with integrity in every business relationship and to meeting our obligations under the UK Bribery Act 2010 and any other applicable anti-corruption law.

4. Legal Framework

The UK Bribery Act 2010 creates four offences relevant to HUBFORT:

- Section 1: offering, promising, or giving a bribe
- Section 2: requesting, agreeing to receive, or accepting a bribe
- Section 6: bribing a foreign public official
- Section 7: failure of a commercial organisation to prevent bribery by associated persons

Individual penalties include up to ten years' imprisonment and unlimited fines. HUBFORT, as a commercial organisation, faces unlimited fines, debarment from public contracts, and serious reputational harm. The Section 7 offence is one of strict liability, with a statutory

defence only where the company can show it had adequate procedures in place to prevent bribery.

HUBFORT's policy framework is designed to meet that adequate procedures test, informed by the Ministry of Justice guidance and the six principles: proportionate procedures, top-level commitment, risk assessment, due diligence, communication and training, and monitoring and review.

5. Definitions

- Bribe: a financial or other advantage offered, given, promised, requested, or accepted to induce or reward improper performance of a function or activity, or where acceptance itself would be improper
- Corruption: abuse of entrusted power for private gain
- Public official: anyone holding a legislative, administrative, or judicial position; anyone performing a public function; and employees or officers of public international organisations and state-owned enterprises
- Associated person: anyone who performs services for or on behalf of HUBFORT, including employees, agents, and subsidiaries

6. What Is Prohibited

Employees and anyone acting for HUBFORT must not, directly or through a third party:

- Offer, promise, give, or authorise any bribe
- Request, agree to receive, or accept any bribe
- Make a facilitation payment to a public official (see Facilitation Payments Policy)
- Use a gift, hospitality, donation, or sponsorship to improperly influence a decision
- Structure payments through agents, consultants, or other intermediaries to disguise a bribe
- Turn a blind eye to indicators of bribery by a colleague, supplier, or partner

7. Gifts, Hospitality, Donations, and Related Activity

Legitimate gifts, hospitality, business meals, and charitable or political activity are governed by specific policies that set out approval thresholds, registers, and red flags:

- Gifts Policy
- Entertainment Policy
- Business Meals Policy
- Facilitation Payments Policy
- Charitable Contributions and Donations Policy
- Political Contributions Policy

This policy governs how those activities sit within HUBFORT's overall anti-bribery framework. Where any of the specific policies is silent, the stricter position prevails.

8. Risk Assessment

HUBFORT maintains a bribery risk assessment covering the company's geographies, sectors, client types, intermediaries, and transaction types. The assessment is reviewed annually and whenever the business materially changes, for example on entering a new

sector, taking on a high-risk client, or engaging an agent in a new jurisdiction. Higher-risk areas trigger enhanced controls, due diligence, and monitoring.

9. Due Diligence on Third Parties

Third parties that act on HUBFORT's behalf can create Section 7 liability for the company. Before engaging an agent, reseller, introducer, subcontractor, or any other associated person, HUBFORT carries out risk-based due diligence including:

- Ownership and beneficial ownership verification
- Sanctions and politically exposed person (PEP) screening
- Checks against the UK, EU, US OFAC, and UN sanctions lists
- Reference and reputation checks
- Review of commission, fee, or payment structures for anything unusual
- Written anti-bribery commitments and audit rights in the contract

Enhanced due diligence applies where the third party operates in higher-risk jurisdictions, interacts with public officials, or is paid on a success or commission basis.

10. Contractual Protections

HUBFORT's standard terms for associated persons include:

- A warranty of compliance with UK Bribery Act 2010 and equivalent laws
- An obligation to notify HUBFORT of any suspected bribery
- A right to audit compliance
- A right to terminate immediately for breach, with no compensation
- A right to withhold payment where a bribery concern is being investigated

11. Red Flags

Be alert to, and report, any of the following:

- A request for payment to a third country or to a party not involved in the transaction
- A request for payment in cash, or to a personal account
- An agent refusing to provide written terms, or objecting to anti-bribery clauses
- Unusually high commissions or fees with no clear justification
- A supplier or client introducing a public official to the transaction
- Generic or vague descriptions on invoices
- A client insisting on a specific agent or consultant as a condition of the deal
- Lavish gifts, hospitality, or favours offered at a decision point

12. Books and Records

All payments, receipts, expenses, and contractual arrangements must be recorded accurately and transparently in HUBFORT's books. False invoicing, off-book accounting, mislabelling of payments, and unrecorded cash transactions are prohibited and will be treated as gross misconduct.

13. Roles and Responsibilities

- Board: sets the tone from the top, approves the policy, and receives the annual compliance report
- Managing Director: day-to-day accountable owner; approves high-value gifts, hospitality, donations, and supplier engagements; escalates material concerns to the board
- All staff: understand and follow this policy, declare conflicts, raise concerns, and complete required training
- Finance: maintains the central gifts, hospitality, donations, and entertainment registers; performs spot checks
- Procurement lead (or Managing Director where the role is unfilled): runs third-party due diligence

14. Training and Communication

- Anti-bribery training on induction for all new joiners
- Refresher training for all staff annually
- Enhanced training for staff in procurement, sales, and partner-facing roles
- The policy is published on the intranet and is included in the supplier onboarding pack
- Key changes are communicated to all staff at the point of update

15. Reporting Concerns

Any person with information about actual, suspected, or attempted bribery should report it without delay through one of the following channels:

- Line manager
- Managing Director directly
- Confidential whistleblowing channel (see Whistleblowing Policy)

Reports made in good faith are protected. HUBFORT will not tolerate retaliation, victimisation, or detriment to anyone raising a concern, even if the concern turns out to be unfounded.

16. Monitoring and Review

The Managing Director reports annually to the board on:

- Policy breaches and near-misses
- Gifts, hospitality, and donation register trends
- Third-party due diligence outcomes
- Training completion rates
- Risk assessment updates

The policy is reviewed at least annually, or earlier where the business, risk, or legal landscape changes.

17. Breach

Breach of this policy is a serious disciplinary matter and may amount to gross misconduct resulting in summary dismissal. Contractors and agents found in breach will have their engagement terminated. Where there is credible evidence of criminal conduct, HUBFORT will report the matter to the Serious Fraud Office, Action Fraud, or other appropriate authority, and will co-operate fully with any investigation.

18. Related Documents

- Gifts Policy
- Entertainment Policy
- Facilitation Payments Policy
- Business Meals Policy
- Business Travel Policy
- Charitable Contributions and Donations Policy
- Political Contributions Policy
- Whistleblowing Policy
- Conflicts of Interest Policy
- Code of Conduct
- Supplier Code of Conduct

Approval

This policy has been reviewed and approved for release by the undersigned.

Approved By	Role	Date
Syed Ehsan	Managing Director	16 April 2026