

HUBFORT

FACILITATION PAYMENTS POLICY

Policy Title	Facilitation Payments 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 policy sets out HUBFORT's position on facilitation payments, sometimes referred to as 'grease payments'. It supports our zero-tolerance approach to bribery and corruption under the UK Bribery Act 2010.

2. Scope

This policy applies to all employees, directors, contractors, consultants, agents, and any third party acting on behalf of HUBFORT anywhere in the world. It applies regardless of local custom or the value involved.

3. Definition

A facilitation payment is a small, unofficial payment made to a public official to secure or speed up a routine action the official is already obligated to perform. Examples include:

- Clearing goods through customs
- Issuing a licence, permit, or visa the applicant is entitled to
- Providing utility connections, phone lines, or mail
- Processing government paperwork such as work permits

The size of the payment, the label used to describe it, and whether it was demanded rather than offered do not change its nature. It remains a bribe under UK law.

4. Policy Statement

HUBFORT prohibits the giving, offering, promising, or authorising of facilitation payments in any form, anywhere in the world. This prohibition is absolute. No business objective, contractual deadline, or operational inconvenience justifies a breach.

Under the UK Bribery Act 2010, facilitation payments are a criminal offence. Individuals face up to ten years' imprisonment and unlimited fines. HUBFORT, as a commercial organisation, faces unlimited fines and reputational damage that would threaten its licence to operate.

5. Duress and Safety Exception

Where a payment is demanded under genuine duress, meaning there is a credible threat to personal health, safety, or liberty, personal safety takes priority. If you are forced to make a payment in such circumstances:

- Make the payment only to the extent necessary to remove the threat
- Keep any documentation you can safely obtain
- Report the incident to the Managing Director within 24 hours of returning to a safe location
- Record the payment accurately in company books, describing it truthfully as an extortion payment

Commercial inconvenience, delay, or loss of opportunity does not constitute duress.

6. Red Flags

Be alert to the following warning signs:

- Requests for payment in cash, to a personal account, or to a third country
- Vague descriptions such as 'processing fee', 'expediting charge', or 'special handling'
- No official receipt offered, or a receipt with no letterhead or reference number
- Pressure to pay quickly or in private
- Amounts that seem disproportionate to the service

7. Reporting Obligations

Any employee or third party who is asked for, witnesses, or suspects a facilitation payment must report it promptly to the Managing Director or via the confidential reporting channel. Good faith reports will not result in retaliation, even if the concern turns out to be mistaken.

8. Record Keeping

All payments made by or on behalf of HUBFORT must be recorded accurately in company books and supported by documentary evidence. Any attempt to disguise a prohibited payment through false invoicing, mis-description, or off-book accounting is itself a serious disciplinary and potentially criminal matter.

9. Training

All staff receive anti-bribery training on induction and annually thereafter. Staff in customer-facing or procurement roles receive enhanced training covering scenarios relevant to their work.

10. Breach

Breach of this policy will result in disciplinary action up to and including summary dismissal. HUBFORT will report credible evidence of criminal conduct to the relevant authorities,

including the Serious Fraud Office where appropriate. Contractors and agents found in breach will have their engagement terminated.

11. Related Documents

- Anti-Bribery and Corruption Policy
- Gifts Policy
- Whistleblowing Policy
- 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