Fraud, Bribery, Malpractice & Corruption Policy Statement

FOR OFFICE USE ONLY	
Issue No:	1
Issue Date:	01/08/2025
Last Review:	01/03/2026
Classification:	Public

Fraud, Bribery, Malpractice & Corruption Policy Statement

This Policy has been assembled to protect Company operations, Customers, shareholders and Employees from the adverse effect of Fraud, Bribery, Malpractice and Corruption and to comply with the Bribery Act 2010 and Competition Law.

It is our policy to conduct all our business in an honest and ethical manner. The Company always requires all staff to act with honesty, integrity and to safeguard the resources for which they are responsible. Fraud, bribery, unethical behaviour and theft are an ever-present threat to these resources and hence must be a concern to all members of staff. Bribery and fraudulent or dishonest behaviour can result in substantial cost to the Company, loss of business and damage to our reputation. We are committed to implementing and enforcing effective systems to counter these threats and take a zero-tolerance approach.

Who Is Covered by the Policy?

This policy applies to all individuals working at all levels and grades, including senior Managers, Directors, Employees (whether permanent, fixed term or temporary), Consultants, Contractors, and any other person providing services to us.

Fraud, Bribery, Malpractice and Corruption

This is the deliberate action, or the allowing of action to be taken by another, for the purpose or intention of:

- Obtaining money, assets or services.
- Distorting business performance.
- Causing loss to the Company, supplier or Employee.
- Accepting high value gifts or inappropriate hospitality.
- Prejudicing the Company's competitive position or business reputation.
- Money laundering.
- Unauthorised release of confidential information.
- Employment of illegal immigrants, those working under an assumed name or anyone unauthorised to work or carry on business in the UK.

What is a Bribe?

A bribe is a financial or other advantage offered or given:

- To anyone to persuade them to or reward them for performing their duties improperly or;
- To any public official with the intention of influencing the official in the performance of his duties.

Gifts and Hospitality

This policy does not prohibit giving and receiving promotional gifts of low value and normal and appropriate hospitality. However, in certain circumstances gifts and hospitality may amount to bribery and all Employees must comply strictly with our ethics policy in respect of gifts and hospitality. We will not provide gifts or hospitality with the intention of persuading anyone to act improperly or to influence a public official in the performance of his duties.

Facilitation Payments and Kickbacks

We do not make, and will not accept, facilitation payments or "kickbacks" of any kind. Facilitation payments are typically small, unofficial payments made to secure or expedite a routine government action by a government official. Kickbacks are typically payments made in return for a business favour or advantage. All Employees must avoid any activity that might lead to, or suggest, that a facilitation payment or kickback will be made or accepted by us.

Donations

We do not make contributions of any kind to political parties. No charitable donations will be made for the purpose of gaining any commercial advantage.

Record Keeping

- We will keep financial records and have appropriate internal controls in place which will evidence the business reason for making any payments to third parties.
- All expense claims relating to hospitality, gifts or expenses incurred to third parties must be submitted in accordance with our expenses policy and specifically Record the reason for the expenditure.
- All accounts, invoices, memoranda and other documents and records relating to dealings with third parties, such as Clients, suppliers and business contacts, must be prepared and maintained with strict accuracy and completeness. No accounts must be kept "off-book" to facilitate or conceal improper payments.

Raising Concerns

All persons covered by this Policy have a role to play in preventing, detecting and reporting fraud, bribery, malpractice or corruption. Employees are encouraged to raise concerns about any issue or suspicion of malpractice at the earliest possible stage. No Employee will suffer any detriment because of raising genuine concerns about fraud, bribery, malpractice or corruption even if they turn out to be mistaken.

Employees must:

- Carry out duties in such a way as to prevent fraud, bribery, malpractice or corruption.
- Immediately report any suspicion of unethical behaviour to the Managing Director or another Senior Manager.

Following the Reporting of Suspected Malpractice:

- Every reported incident of fraud, bribery, malpractice or corruption will be investigated.
- The confidence of those reporting the incident or suspicion will be respected.
- The investigation will be carried out either internally by Managers, appointed by the Managing Director, having no operational responsibility within the business unit implicated or externally by an appointed agency reporting to the Managing Director.
- In all cases the Managing Director will take the decision as to whether the police or other authorities should be brought into the investigation.

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Monitoring

The effectiveness of this policy will be regularly reviewed by the board. Internal control systems and procedures will be subject to audit under the internal audit process.

The Board of Cuffe Plc is fully committed to ensuring that Cuffe Plc complies both with the letter and spirit of the principles in the Fraud, Bribery, Malpractice and Corruption Policy. For that reason, Mr Simon Cook has been appointed by Cuffe Plc with the responsibility and authority to oversee and drive our Fraud, Bribery, Malpractice and Corruption Policy.

Name	Simon Cook
Signed	
Position	Managing Director
Date	01/03/2026