

Anti-Bribery & Corruption Policy

SparkTricity Ltd is committed to conducting business fairly, honestly and transparently, and to complying fully with the Bribery Act 2010. We have a zero-tolerance approach to bribery and corruption.

Scope

This policy applies to all employees, directors, contractors, agents and anyone acting on our behalf, in all dealings in the UK and elsewhere.

What is not acceptable

- Offering, giving, requesting or accepting any bribe or improper payment to obtain or retain business or an advantage.
- Making or accepting facilitation payments or "kickbacks" of any kind.
- Offering or accepting gifts or hospitality intended to influence a business decision.

Gifts and hospitality

Reasonable and proportionate gifts and hospitality given openly are acceptable, provided they are not intended to influence a decision, are of modest value, and are recorded. If in doubt, seek approval from the Managing Director.

Raising concerns

Anyone who suspects bribery or corruption must report it to the Managing Director or through our Whistleblowing Policy. We will not penalise anyone for refusing to pay or accept a bribe, or for raising a genuine concern. Breaches may result in disciplinary action and, where appropriate, referral to the authorities.

Signed (digitally signed): Manjit S. Tamber, Managing Director, SparkTricity Ltd

Reviewed: December 2025 · Next review: December 2026