

ANTI BRIBERY & CORRUPTION POLICY

At Powell & Co we are aware of and responsible that every employee and individual acting on the Company's behalf is responsible for maintaining the Company's reputation and for conducting business honestly and professionally.

The Company considers that bribery and corruption has a detrimental impact in business by undermining good governance and distorting free markets and benefits from carrying out business in a transparent and ethical way.

The Company does not tolerate any form of bribery, whether direct or indirect, by, or of, its employees, officers, agents or consultants or any person or companies acting for it or on its behalf.

Top management are committed to implementing and enforcing effective systems to prevent and eliminate bribery, in accordance with the Bribery Act 2010.

A bribe is a financial advantage or other reward that is offered to, given to, or received by an individual or company (whether directly or indirectly) to induce or influence that individual or company to perform public or corporate functions or duties improperly.

Employees and others acting for or on behalf of the Company are strictly prohibited from making, soliciting, or receiving any bribes or unauthorised payments and as part of its anti-bribery measures, the Company accepts transparent, proportionate, reasonable, and bona fide hospitality that includes promotional expenditure, whether given or received.

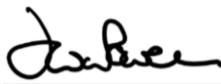
A breach of these Policies by an employee may be treated as grounds for disciplinary action.

The success of the Company's anti-bribery and corruption measures depends on all employees, and those acting for the Company, playing their part in helping prevent bribery and tax evasion.

Therefore, all employees and others acting for, or on behalf of, the Company are encouraged to report any suspected bribery in accordance with the procedures set out in the Policies or in the case of third parties to the management.

The Company will support any individuals who make such a report in good faith.

Signed



Jason Powell *Director Responsible*

Date

1st December 2024

Review Date:

At least annually or as required following significant changes to the business management system.