



Anti-Bribery, Corruption and Ethical Behaviour Policy

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1 What Does Our Policy Cover?

This Policy sets out the responsibilities of PMW Dynamics LTD and those who work for us regarding observing and upholding our zero-tolerance position on Bribery and Corruption and our commitment to Ethical Behaviours within business, to our staff, customers, and competitors.

It also exists to act as a source of information and guidance for those working for PMW Dynamics. It helps them recognise and deal with bribery and corruption issues, as well as understand their responsibilities.

This Policy applies to all staff who work for PMW Dynamics (including officers, directors, managers, supervisors, employees, temporary, agency and consultancy staff), and include other organisations we do business with.

2 Policy Statement

PMW Dynamics is committed to conducting business in an ethical and honest manner and is committed to implementing and enforcing systems that ensure bribery, corruption and unethical behaviour is prevented. We are committed to acting professionally, fairly, and with integrity in all business dealings and relationships, wherever in the world we operate.

PMW Dynamics will constantly uphold all laws relating to anti-bribery and corruption in all the jurisdictions in which we operate. We are bound by the laws of the UK, including the Bribery Act 2010, regarding our conduct both at home and abroad.

The success of our business is based on the trust we earn from our employees, customers, and shareholders. We gain credibility by adhering to our commitment to fairness and reaching our goals solely through ethical conduct. All staff are expected to adhere to this Code in their professional, as well as personal conduct, treat everyone with respect, honesty, and fairness.

PMW Dynamics recognises that bribery and corruption are punishable by up to ten years of imprisonment and a fine. If our company is discovered to have taken part in corrupt activities, we may be subjected to an unlimited fine, be excluded from tendering for public contracts, and face serious damage to our reputation. It is with this in mind that we commit to preventing bribery and corruption in our business and take our legal responsibilities seriously.



3 Who is Covered by the Policy?

This policy applies to all employees (whether temporary, fixed term, or permanent), consultants, contractors, trainees, seconded staff, home workers, casual workers, agency staff, volunteers, interns, agents, sponsors, or any other person or persons associated with us (including third parties), or any of our subsidiaries or their employees, no matter where they are located (within or outside of the UK). The policy also applies to Officers, Trustees, Board, and/or Committee members at any level.

In the context of this policy, third-party refers to any individual or organisation our company meets and works with. It refers to actual and potential clients, customers, suppliers, distributors, business contacts, agents, advisers, and government and public bodies – this includes their advisors, representatives and officials, politicians, and public parties.

Any arrangements our company makes with a third party is subject to clear contractual terms, including specific provisions that require the third party to comply with minimum standards and procedures relating to anti-bribery and corruption.

4 Definition of Bribery and Ethical Behaviour

Bribery refers to the act of offering, giving, promising, asking, agreeing, receiving, accepting, or soliciting something of value or of an advantage so to induce or influence an action or decision.

A bribe refers to any inducement, reward, or object/item of value offered to another individual to gain commercial, contractual, regulatory, or personal advantage.

Bribery is not limited to the act of offering a bribe. If an individual is on the receiving end of a bribe and they accept it, they are also breaking the law.

Bribery is illegal. Employees must not engage in any form of bribery, whether it be directly, passively (as described above), or through a third party (such as an agent or distributor). They must not bribe a foreign public official anywhere in the world. They must not accept bribes in any degree and if they are uncertain about whether something is a bribe or a gift or act of hospitality, they must seek further advice from the Company's Managing Director.

Ethical behaviour means we operate according to fair and transparent standards, not just complying with legal rules or regulatory requirements, but going above and beyond to ensure honesty, fairness and equity in interpersonal, professional, and commercial relationships that respects the dignity, diversity and rights of individuals and groups of people.



5 Bribery

What is and what is **NOT** Acceptable

This section of the policy refers to 4 areas:

- a. Gifts and Hospitality
- b. Facilitation Payments
- c. Political Contributions
- d. Charitable Contribution

5.1 Gifts and Hospitality

PMW Dynamics accepts normal and appropriate gestures of hospitality and goodwill (whether given to/received from third parties) so long as the giving or receiving of gifts meets the following requirements:

- a. It is not made with the intention of influencing the party to whom it is being given, to obtain or reward the retention of a business or a business advantage, or as an explicit or implicit exchange for favours or benefits.
- b. It is not made with the suggestion that a return favour is expected.
- c. It is compliant with local law.
- d. It is given in the name of the company, not in an individual's name.
- e. It does not include cash or a cash equivalent (e.g., a voucher or gift certificate)
- f. It is appropriate for the circumstances (e.g., giving small gifts around Christmas or as a small thank you to a company for helping with a large project upon completion)
- g. It is of an appropriate type and value and given at an appropriate time, considering the reason for the gift.
- h. It is given and received openly, not secretly.
- i. It is not selectively given to a key, influential person, clearly with the intention of directly influencing them.
- j. It is not above a certain excessive value, as pre-determined by the company's Directors (usually more than £100)
- k. It is not offered to, or accepted from, a government official or representative or politician or political party, without the prior approval of one of the company's Directors.

Where it is inappropriate to decline the offer of a gift (i.e., when meeting with an individual of a certain religion/culture who may take offence), the gift may be accepted so long as it is declared to your manager, who will assess the circumstances.



PMW Dynamics recognises that the practice of giving and receiving business gifts varies between countries, regions, cultures, and religions, so definitions of what is acceptable and not acceptable will inevitably differ for each.

As good practice, gifts given and received should always be disclosed to your manager. Gifts from suppliers should always be disclosed.

The intention behind a gift being given or received should always be considered. If there is any uncertainty, the advice of the Managing Director should be sought.

5.2 Facilitation Payments and Kickbacks

PMW Dynamics does not accept and will not make any form of facilitation payments of any nature. We recognise that facilitation payments are a form of bribery that involves expediting or facilitating the performance of a public (or other) official for a routine governmental (or other) action. We recognise that they tend to be made by low level officials with the intention of securing or speeding up the performance of a certain duty or action.

PMW does not allow kickbacks to be made or accepted. We recognise that kickbacks are typically made in exchange for a business favour or advantage.

5.3 Political Contributions

PMW Dynamics will not make donations, whether in cash, kind, or by any other means, to support any political parties or candidates. We recognise this may be perceived as an attempt to gain an improper business advantage.

5.4 Charitable Contributions

PMW Dynamics accepts (and indeed encourages) the act of donating to charities – whether through services, knowledge, time, or direct financial contributions (cash or otherwise) – and agrees to disclose all charitable contributions it makes.

Employees must be careful to ensure that charitable contributions are not used to facilitate and conceal acts of bribery.

We will ensure that all charitable donations made are legal and ethical under local laws and practices, and that no donations are offered / made without the approval of senior management.



6 Ethical Behaviour

6.1 Ethical Principles and Values

Our Core Values Are:

- a. Honesty
- b. Integrity
- c. Trustworthiness
- d. Respect for others
- e. Responsibility
- f. Accountability
- g. Reliability
- h. Compliance with Quality and Legal Obligations

6.2 Ethical Decision Making

Ethical conduct is a value-driven decision-making. Several key questions can help to identify situations that may be unethical, inappropriate, or illegal.

Ask yourself:

- a. Is what I am doing legal?
- b. Does it reflect our company values and ethics?
- c. Does it comply with the Code and company rules/policies?
- d. Does it respect the rights of others?
- e. How would it look if it made the news headlines?
- f. Is this the right thing to do?
- g. Have I been asked to misrepresent information or deviate from normal procedure?

6.3 Compliance with laws and regulations

Our commitment to integrity begins with complying with laws, rules, and regulations. We understand and comply with the legal requirements and commercial practices of lawful business.

We are committed to adhere to every valid and binding contractual agreement that we conclude, and we do not abuse our rights.

Our staff must follow applicable laws and regulations, always including this Policy and must ensure compliant operation.



6.4 Sustainability

We are committed to meet current requirements without compromising the needs of future generations. To this, we combine economic, environmental, and social factors in our operation and our business decisions.

6.5 Human Rights

We are committed to respect human dignity and rights of each individual and community whom we interact with during work. We shall not, in any way, cause or contribute to the violation of human rights. Our staff shall treat everybody with dignity, respect and care and uphold human rights.

6.6 Employment Practices and Working Conditions

We are committed to promote equality in our employment practices and to fair employment and remuneration policy in compliance with applicable laws. We condemn all forms of illegal, unfair, unethical labour practice that exploits workforce, destroys social security, or serves as tax evasion, including but not limited to undeclared and “grey” work.

Our staff shall act with integrity and treat their colleagues and others through the work with respect.

6.7 Discrimination and Harassment

We provide equal opportunity in employment, and we do not tolerate any discrimination or harassment or any type from abuse. No direct or indirect discrimination shall take place based on any professionally non-relevant trait or circumstance, like gender, marital status, age, national or social or ethnic origin, colour, religion and political opinion, disability, sexual orientation, employee representation, property, birth, or other status. Any kind of discriminatory behaviour, harassment, bullying, or victimisation is prohibited.

All staff is expected to follow the highest standards of conduct in all verbal and written communication based on mutual respect, and must refrain from any form of harassment, slander or any behaviour that could be taken as offensive, intimidating, humiliating, malicious or insulting.

6.8 Health Safety and Environment

We provide clean, safe, and healthy work conditions and we are dedicated to maintaining a healthy environment. We are committed to minimise the impact on the natural environment of our operations. We make efforts to reduce the use of finite resources, like energy or water, and the harmful emissions, like waste.

All staff must follow and comply with every relevant health, safety and environmental protection laws, regulations and rules all times.

6.9 Competition and Business Conduct

Our relationships with business partners are built upon trust and mutual benefits compliant with competition law. We are dedicated to ethical and fair competition, as we sell products and services based on their quality, functionality, and competitive pricing. We will make independent pricing and marketing decisions and will not improperly cooperate or coordinate our activities with our competitors. We will not offer or solicit improper



payments or gratuities, nor will we engage or assist in unlawful boycotts of customers. We commit to comply with all applicable trade controls, restrictions, sanctions, and import-export embargos.

We refrain from damaging competition and the reputation of any business partners and any behaviour that harms competitor's creditability.

We do not hold back maliciously, unlawfully, or unduly payments towards our partners, and we do not allow such practices in our supply chain, we fight the unethical practice of "debt chain".

Our staff is responsible for ensuring fair business during their job and adhere to every competition, consumer protection and fair marketing rule. Customers and business partners shall be treated fairly and equally, products and services shall be displayed in a manner that is fair and accurate (fair marketing and advertising), and that discloses all relevant information.

6.10 Security, Protection, and Proper use of Company Assets

We are responsible for the security, protection and for the economic use of company resources. Our resources, including time, material, equipment, and information are provided for legitimate business use only. Occasional personal use is permissible if it is lawful, does not affect job performance or disrupt workplace morale.

All staff are obliged to follow appropriate security measures and they should treat company property, whether material or intangible, with respect and shouldn't misuse company assets or use it carelessly.

6.11 Confidentiality, Information Security, Proprietary Information, and Intellectual Property

We are committed to business information confidentiality, integrity, and accessibility, we implement proper technical security measures for this, and it is our staff's obligation to follow those measures. Proprietary information includes all non-public information that might be harmful to the company or its customers, business partners if disclosed to unauthorised parties. All staff must handle any such information as confidential. Every rule ensuring information security must be followed all times. We respect the property rights of others. We will not acquire or seek to acquire trade secrets or other proprietary or confidential information by improper means. We will not engage in unauthorised use, copying, distribution or alteration of software or other protected intellectual property.

6.12 Bookkeeping and Financial Integrity

Our accounts, and financial statements must be maintained in appropriate detail, must truly and properly reflect our transactions. We condemn all forms of money laundering, so we are committed to do business with partners involved in legitimate business activities with funds derived from legitimate sources. We commit ourselves to fair taxation and to avoid all tax evasion practices, including such as failing to issue receipt or accounting fake expense invoices.

All staff must follow accounting procedures, ensure that business transactions are recorded and documented appropriately and make certain that all disclosures made in financial reports are full, honest, accurate, timely and understandable. All staff must not improperly influence, manipulate, or mislead any audit.



6.13 Fraud

Fraud, the act, or intent to cheat, steal, deceive or lie, is both unethical and, in most cases, criminal. Fraud in every form, (including e.g., submitting false expense reports; forging or altering financial documents or certifications; misappropriating assets or misusing company property; making any untrue financial or non-financial entry on records or statements) is prohibited.

6.14 Conflicts of Interests

Our decisions shall be based on objective and fair assessments avoiding the possibility of any improper influence. A "conflict of interest" exists when an employee's personal interest (that can be linked to e.g., friends, family, or customer, competitor, supplier, contractor entity, as well) interferes or potentially interferes with the best interests of the Company. Determining whether a conflict of interest exists is not always easy to do, thus anyone with a conflict-of-interest question should seek advice from management.

Conflicts of interest could arise:

- a. Being employed (you or a close family member) by or being in economic relation with an actual or potential customer, competitor, supplier, or contractor.
- b. Hiring or supervising family members or closely related persons.
- c. Serving as a board member for another company or organisation.
- d. Owning or having a substantial interest in a customer, competitor, supplier, or contractor.
- e. Having a personal interest, financial interest, or potential personal gain in any company transaction.

If co-workers become involved in personal relations with each other, the onus is on the senior employee concerned to bring this to the attention of his or her manager to confirm that there is no conflict of interest, nor will a conflict of interest arise.

6.15 Privacy and Personal Data Protection

We respect people's privacy, and we acknowledge customers, employees and other natural persons' need to feel confident that their personal data is processed appropriately and for a legitimate business purpose. We are committed to comply with all personal data protection laws. We only acquire and keep personal information that is necessary, and we give proper information on these activities to data owners. We implement proper security measures to assure confidentiality, integrity, and availability of personal information.

Our staff must observe the legal requirements, apply compliant practices, and follow related procedures to ensure legality of personal data handling and processing activities.



7 Employee Responsibilities

As an employee of PMW Dynamics, you must ensure that you read, understand, and comply with the information contained within this policy, and with any training or other anti-bribery, corruption, and ethical behaviours information you are given.

All employees and those under our control are equally responsible for the prevention, detection, and reporting of unethical behaviour, bribery, and other forms of corruption. They are required to avoid any activities that could lead to, or imply, a breach of this policy.

If you have reason to believe or suspect that an instance of unethical behaviour, bribery or corruption has occurred or will occur in the future that breaches this policy, you must notify the Managing Director.

If any employee breaches this policy, they will face disciplinary action and could face dismissal for gross misconduct. PMW Dynamics has the right to terminate a contractual relationship with an employee if they breach this policy.

7.1 What happens if I need to raise a concern?

This section of the policy covers 3 areas:

- a. How to raise a concern
- b. What to do if you are a victim of unethical behaviour, bribery or corruption
- c. Protection

7.2 How to Raise a Concern

If you suspect that there is an instance of unethical behaviour, bribery or corrupt activities occurring in relation to PMW Dynamics, you are encouraged to raise your concerns at as early a stage as possible. If you're uncertain about whether a certain action or behaviour can be considered unethical, bribery or corruption, you should speak to the Managing Director.

PMW Dynamics will maintain a "whistle blowing" policies/principles such that employees can vocalise their concerns swiftly and confidentially.

7.3 What to do if you are a Victim of Unethical Behaviour, Bribery or Corruption

You must tell the Managing Director as soon as possible if you have witnessed or been the victim of unethical behaviour, have been offered a bribe by anyone, if you are asked to make one, if you suspect that you may be



bribed or asked to make a bribe in the near future, or if you have reason to believe that you are a victim of another corrupt activity.

7.4 Protection

If you refuse to accept or offer a bribe or you report a concern relating to potential act(s) of bribery, corruption, and unethical behaviour PMW Dynamics understands that you may feel worried about potential repercussions. PMW Dynamics will support anyone who raises concerns in good faith under this policy, even if investigation finds that they were mistaken.

PMW Dynamics will ensure that no one suffers any detrimental treatment as a result of unethical behaviour, or for refusing to accept or offer a bribe or any other corrupt activities or because they reported a concern relating to potential act(s) of bribery, corruption, or unethical behaviour.

Detrimental treatment refers to dismissal, disciplinary action, threats, or unfavourable treatment in relation to the concern the individual raised.

If you have reason to believe you've been subjected to unjust treatment as a result of raising a concern, you should inform the Managing Director immediately.

8 Training and Communication

PMW Dynamics' anti-bribery, corruption and unethical behaviour policy and its zero-tolerance attitude should be clearly communicated to all suppliers, contractors, business partners, and any third parties at the outset of business relations, and as appropriate thereafter.

PMW Dynamics will provide relevant anti-bribery, corruption, and unethical behaviour training to employees where we feel their knowledge of how to comply with the policy or the Bribery Act needs to be enhanced. As good practice, all businesses should provide their employees with anti-bribery training where there is a potential risk of facing bribery or corruption during work activities.



9 Record Keeping

PMW Dynamics will keep detailed and accurate financial records and will have internal controls in place to act as evidence for all payments made. We will declare and keep a written record of the amount and reason for hospitality or gifts accepted and given and understand that gifts and acts of hospitality are subject to managerial review.

10 Monitoring and Reviewing

PMW Dynamics' management is responsible for monitoring the effectiveness of this policy and will review the implementation of it on a regular basis. They will assess its suitability, adequacy, and effectiveness.

Internal control systems and procedures designed to prevent unethical behaviours, bribery, and corruption are subject to regular audits to ensure that they are effective in practice.

All needs for improvement will be applied as soon as possible. Employees are encouraged to offer their feedback on this policy if they have any suggestions for how it may be improved. Feedback of this nature should be addressed to the Managing Director.

This policy forms part of an employee's contract of employment and PMW Dynamics may amend it at any time so to improve its effectiveness at combating bribery, corruption, and unethical behaviour.