

Anti-Bribery & Anti-Corruption Policy

Company: Connexion Developments Ltd

Issue Date: January 2026

Review Cycle: Annual or upon significant business change

1. Purpose

Connexion Developments Ltd is committed to conducting business ethically, transparently, and with integrity. This Anti-Bribery & Anti-Corruption Policy sets out our zero-tolerance approach to bribery, corruption, and improper business practices.

The purpose of this policy is to ensure that all individuals working for or on behalf of the company understand their responsibilities in preventing, recognising, and reporting bribery and corruption.

2. Scope

This policy applies to:

- All employees and directors of Connexion Developments Ltd
- Temporary staff, contractors, consultants, and agency workers
- Suppliers, distributors, agents, and other third parties acting on our behalf

This policy applies to all business activities, both within the UK and internationally.

3. Legal Framework

Connexion Developments Ltd complies fully with all applicable anti-bribery and anti-corruption legislation, including the **UK Bribery Act 2010**.

Bribery and corruption are serious criminal offences and may result in significant legal, financial, and reputational consequences for both individuals and the company.

4. Policy Statement

Connexion Developments Ltd operates a strict **zero-tolerance** approach to bribery and corruption.

We will not:

- Offer, promise, give, request, or accept bribes or improper inducements
- Engage in corrupt practices, directly or indirectly
- Allow third parties to engage in bribery on our behalf

All business decisions must be made fairly, objectively, and in the best interests of the company.

5. Definition of Bribery and Corruption

Bribery is the offering, giving, requesting, or receiving of anything of value with the intention of improperly influencing a decision or action.

Corruption includes abuse of entrusted power for private gain, whether financial or otherwise.

Bribery may occur directly or indirectly through third parties. Both offering and accepting bribes are prohibited.

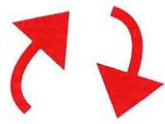
6. Gifts, Hospitality, and Expenses

Gifts and hospitality must never be used to influence, or be perceived to influence, business decisions.

Acceptable gifts and hospitality must:

- Be reasonable, proportionate, and infrequent
- Be transparent and openly declared where appropriate
- Comply with local laws and regulations
- Never involve cash or cash equivalents

Gifts or hospitality involving government officials, or those exceeding a reasonable value threshold (generally £100), must receive prior management approval.



7. Facilitation Payments and Kickbacks

Connexion Developments Ltd strictly prohibits facilitation payments and kickbacks of any kind.

In exceptional circumstances where personal safety is at risk:

- Any payment made must be minimised
- The incident must be reported immediately to management
- Full records must be maintained

8. Political and Charitable Contributions

Political Contributions

Connexion Developments Ltd does not make political donations or contributions, either directly or indirectly.

Charitable Contributions

Charitable donations may be supported where they are:

- Legal and ethical
- Made transparently
- Not used as a means of improper influence

All charitable contributions must receive prior management approval.

9. Responsibilities

Management

Management is responsible for:

- Promoting a culture of ethical conduct
- Ensuring this policy is implemented and enforced
- Providing guidance and oversight where required

Employees and Others

All individuals covered by this policy are responsible for:

- Understanding and complying with this policy
- Remaining vigilant to bribery and corruption risks
- Reporting concerns promptly and in good faith

10. Reporting Concerns

Any suspected or actual bribery or corruption must be reported at the earliest opportunity.

Concerns may be raised with:

- A line manager
- Senior management or a company director

Concerns raised in good faith will be handled confidentially and without retaliation, in line with our Whistleblowing Policy.

11. Training and Awareness

Connexion Developments Ltd provides appropriate guidance and awareness to employees regarding anti-bribery and anti-corruption responsibilities relevant to their role.

12. Record-Keeping and Controls

The company maintains accurate books, records, and financial controls to ensure transparency and accountability.

All payments, gifts, and hospitality must be recorded accurately and be subject to appropriate review.

13. Breaches and Disciplinary Action

Breaches of this policy may result in disciplinary action, up to and including dismissal, termination of contracts, and potential legal action.

14. Policy Review

This policy will be reviewed annually or following significant changes to legislation or business operations.

Approved by:

Managing Director

For and on behalf of Connexion Developments Ltd