



Ai Automation Ltd.
14 Sheffield Street,
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Greater Manchester,
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Anti-Bribery and Corruption Policy

Latest Revision	January 2024
Next Due Revision	January 2025

Introduction

This anti-bribery and corruption policy exists to set out the responsibilities of Ai Automation to conduct business in an honest and ethical manner. As part of that, the company takes a zero-tolerance approach to bribery and corruption and is committed to acting professionally, fairly and with integrity in all its business dealings and relationships, wherever it operates, and implementing and enforcing effective systems to counter bribery.

Scope

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners. This policy does not form part of any employee's contract of employment and we may amend it at any time.

Definition of Bribery

Bribery refers to the act of offering, giving, promising, asking, agreeing, receiving, accepting, or soliciting something of value or of an advantage so as to induce or influence an action or decision. 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, or through a third party. They must not bribe a foreign public official anywhere in the world. They must not accept bribes to 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 director.

What is and what is NOT acceptable

- **Gift and hospitality:** The company accepts normal and appropriate gestures of hospitality and goodwill so long as 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. The intention behind a gift being given/received should always be considered. If there is any uncertainty, the advice of the company director should be sought.
- **Facilitation payments:** The company does not accept and will not make any form of facilitation payments of any nature. We recognise that the facilitation payments are a form of bribery that involves expediting or facilitating the performance of a public official for a routine governmental action.
- **Charitable donations and** The company only makes charitable donations that are legal and ethical under local laws and practices.

Responsibility for the Policy

The Company has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it. The Company has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering bribery and corruption. Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of bribery and corruption. You are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries are encouraged and should be addressed to the company Director.

Compliance with the Policy

You must ensure that you read, understand and comply with this policy. The prevention, detection and reporting of bribery and corruption in any part of our business is the responsibility of all those working for us or under our control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy. You must notify your line manager OR a company Director as soon as possible if you believe or suspect that a conflict with this policy has occurred or may occur in the future.

Communication & Awareness of this Policy

Training on this policy, and on the risk our business faces from bribery and corruption in its supply chains, forms part of the induction process for all individuals who work for us, and updates will be provided using established methods of communication between the business and you. Our zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

Signed: Grant Mullen

Position: Managing Director

Date: 08/01/2024