



DEJA Services. – **Anti-Bribery Policy**

1. Policy Statement

DEJA services is committed to conducting its business with integrity, transparency, and fairness. We have a zero-tolerance approach to bribery and corruption and are fully committed to complying with the Bribery Act 2010, and all applicable anti-bribery and anti-corruption laws in the UK and abroad.

Bribery is a criminal offence. We do not, and will not, pay bribes or offer improper inducements to anyone for any purpose, nor do we accept bribes or improper inducements.

This policy applies to all employees, subcontractors, consultants, suppliers, and any other parties representing DEJA services or acting on its behalf.

2. Definition of Bribery

A bribe is any offer, promise, giving, or receiving of a financial or other advantage, with the intention of inducing or rewarding improper performance of a function or activity.

This includes:

- Offering, promising, or giving a bribe.
- Requesting, agreeing to receive, or accepting a bribe.
- Bribing a foreign public official.
- Failing to prevent bribery by a person associated with the company.

3. Prohibited Conduct

DEJA services strictly prohibits:

- Offering or giving money, gifts, entertainment, or hospitality to gain any commercial, contractual, or regulatory advantage.
- Accepting money, gifts, or favours from a third party as an inducement or reward.
- Engaging in any activity that could be perceived as an attempt to influence someone inappropriately.
- Making facilitation payments (small unofficial payments made to secure or speed up a routine action).
- Political or charitable donations made with the intention of gaining a business advantage.

4. Responsibilities

4.1 Management

- Promote a culture of honesty and integrity.
- Assess bribery risks and implement procedures to prevent bribery.
- Investigate any concerns or reports of bribery.

4.2 Employees and Associated Persons

- Must not offer, give, solicit, or accept bribes.
- Must avoid conflicts of interest and declare any gifts or hospitality above a modest threshold (e.g., £50).
- Must report any concerns about bribery or unethical conduct to a line manager or designated compliance officer.

5. Gifts and Hospitality

Reasonable and proportionate gifts and hospitality may be accepted or offered as long as:

- They are not intended to influence a business decision.
- They are given openly and transparently.
- They are of low value and infrequent.
- They are recorded in the company's Gifts and Hospitality Register.

6. Reporting and Whistleblowing

Employees and other individuals associated with DEJA services are encouraged to report any suspicions of bribery or unethical conduct. Reports can be made confidentially and without fear of retaliation.

7. Consequences of Breach

Any breach of this policy will be treated as a serious matter and may result in:

- Disciplinary action, including dismissal for employees.
- Termination of contracts for contractors or suppliers.
- Criminal prosecution under the Bribery Act 2010, which may result in fines and/or imprisonment.

8. Monitoring and Review

This policy will be reviewed annually and updated as required to reflect changes in law, company operations, or the bribery risk profile. The company will also carry out periodic

Signed: SH

Date: 29.05.2025

