ANTI-BRIBERY & CORRUPTION POLICY

Document REC-POL-003 · Version 1.1 · August 2026 · Review due August 2027

1. Purpose

Recovia Ltd is committed to conducting business with the highest standards of integrity. This policy sets out our approach to preventing bribery and corruption in all business dealings and ensures compliance with the Bribery Act 2010. We do not tolerate bribery, corruption or improper payments in any form, direct or indirect.

2. Scope

This policy applies to all employees, directors and officers of Recovia Ltd; to contractors, consultants, self-employed collectors and third-party service providers acting on our behalf; and to all business operations and dealings in the UK and abroad.

3. Key principles

- **Zero tolerance.** No one acting for Recovia may offer, give, solicit or accept bribes or kickbacks.
- **Gifts and hospitality.** Small, reasonable and proportionate gifts or hospitality may be acceptable but must be transparent, recorded in the gifts register, and approved in advance by the Managing Director.
- **Facilitation payments.** Strictly prohibited.
- **Settlements and negotiations.** Particular care applies to our sector: no employee or agent may accept any personal payment, gift or inducement from a debtor, or offer any personal benefit to a debtor, in connection with the settlement, reduction, delay or discontinuance of recovery action. Any such approach must be reported immediately.
- **Conflicts of interest.** Any situation where personal interests could conflict with duties to the company or its clients must be declared to the Managing Director.
- **Third-party due diligence.** Suppliers, introducers, referral partners and commission agents must meet anti-bribery standards; contracts include anti-bribery clauses where appropriate.

4. Responsibilities

Employees and agents must read, understand and comply with this policy and report suspected bribery immediately. Management ensures training and monitors compliance. The board oversees the policy's effectiveness.

5. Reporting and whistleblowing

Suspected bribery or corruption can be reported confidentially, without fear of retaliation, to **contact@recoviaholdings.co.uk** marked for the attention of the Managing Director, or by telephone on 01527 369593. Reports concerning the Managing Director may be made to the Non-Executive Director. All reports are investigated promptly; confirmed violations result in disciplinary action up to dismissal or termination of contract, and may be reported to the authorities.

6. Training and review

All staff receive training on bribery risks and reporting during onboarding and periodically thereafter. This policy is reviewed annually.

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