

Recovia Ltd Anti-Bribery & Corruption Policy

Effective Date: 21 March 2026

Company: Recovia Ltd

Company Number: 16956861

Registered Address: 3rd Floor, 86-90 Paul Street, London, England, United Kingdom, EC2A 4NE

1. Purpose

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

2. Scope

This policy applies to:

- All employees, directors, and officers of Recovia Ltd
- Contractors, consultants, and third-party service providers acting on our behalf
- All business operations and dealings, both in the UK and abroad

3. Key Principles

1. Zero Tolerance: Employees and associated parties must not offer, give, solicit, or accept bribes or kickbacks.
2. Gifts & Hospitality: Small, reasonable, and proportionate gifts or hospitality may be acceptable but must be fully transparent, recorded, and approved.
3. Facilitation Payments: Strictly prohibited. No employee or associate may make or accept unofficial payments to speed up routine processes.
4. Conflict of Interest: Employees must declare any situation where personal interests could conflict with company obligations.
5. Third-Party Due Diligence: Suppliers, contractors, and partners must comply with anti-bribery standards. Contracts should include anti-bribery clauses where appropriate.

4. Responsibilities

- Employees: Must read, understand, and comply with this policy. Report any suspected bribery or corruption immediately.
- Management: Ensure employees are trained and aware of anti-bribery procedures. Monitor business practices to prevent violations.
- Board of Directors: Responsible for overseeing compliance and reviewing the effectiveness of the policy.

5. Reporting and Whistleblowing

Recovia Ltd encourages all employees and stakeholders to report any suspected bribery or corruption without fear of retaliation. Reports can be made confidentially via:

Email: contact@recoviaholdings.co.uk

All reports are investigated promptly, and any confirmed violations will result in disciplinary action or termination, and may be reported to legal authorities.

6. Training and Awareness

All employees receive regular training on bribery and corruption risks, procedures for reporting, and ethical business conduct. New hires are briefed on this policy during onboarding.

7. Monitoring and Review

This policy is reviewed annually to ensure effectiveness and compliance with current laws and regulations.

Commitment Statement

Recovia Ltd is committed to ethical business practices and expects the same integrity from all employees, contractors, and partners. Upholding this policy is essential to protect our reputation and ensure long-term sustainable growth.

Signed:

Ben Portman

Director, Recovia Ltd

Date: 21 March 2026