

CANNON BUSINESS MANAGEMENT LIMITED

www.cannonbusinessmanagement.co.uk

CBMPL03 v1

Anti-Corruption and Anti-Bribery Policy

Policy Statement:

Cannon Business Management Limited is committed to conducting its business with integrity, honesty, and transparency. We have a zero-tolerance approach to bribery and corruption and will uphold all laws relevant to countering bribery and corruption in the United Kingdom, including the **Bribery Act 2010**.

This policy applies to all employees, directors, contractors, and associates of the company, as well as to any third parties acting on our behalf.

Purpose:

The purpose of this policy is to:

- Ensure compliance with UK anti-bribery and corruption laws.
- Provide clear guidance on acceptable and unacceptable behaviour.
- Protect the reputation and integrity of Cannon Business Management Limited.
- Demonstrate our commitment to fair and ethical business practices.

Scope:

This policy applies to:

- All areas of our business operations, both in the UK and overseas.
- All employees, contractors, consultants, and third parties representing Cannon Business Management Limited.
- All dealings with clients, suppliers, partners, public officials, and other stakeholders.

Definitions:

Bribery: Offering, giving, receiving, or soliciting something of value to influence a business decision or gain an unfair advantage.

Corruption: Abuse of entrusted power for private gain.

Our Commitments:

Prohibited Conduct

- Employees must not offer, give, request, or accept bribes in any form.
- Facilitation payments (small, unofficial payments to speed up routine processes) are strictly prohibited.
- We will not tolerate kickbacks, improper gifts, or excessive hospitality that could influence decision-making.

Gifts and Hospitality

- Reasonable and proportionate hospitality or gifts may be given or received if they are:
 - In good faith.
 - Appropriate to the occasion.
 - Transparent and properly recorded.
- Any hospitality or gift that could be seen as an attempt to influence business decisions must be declined.

Third Parties

- We expect all contractors and business partners to share our commitment to anti-bribery and anti-corruption.
- Due diligence will be carried out on third parties where there is a risk of bribery.

Reporting Concerns

- Employees have a responsibility to report any suspected bribery or corruption.
- Reports will be treated seriously, investigated promptly, and handled in confidence.
- No employee will suffer retaliation for refusing to pay or accept a bribe, or for raising concerns in good faith.

Responsibilities:

Directors and Managers are responsible for implementing and promoting this policy.

Employees and Associates must read, understand, and comply with this policy at all times.

Third Parties representing the company are expected to act consistently with this policy.

Monitoring and Review:

This policy will be reviewed at least once every two years, or sooner if required by changes in legislation or business practice. We will take disciplinary action, up to and including termination of employment or contract, against any individual found to be in breach.

Approved by:

Cannon Business Management Limited

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