SH PROFESSIONAL SERVICES

Ref: SHPRCO013

Anti-Bribery and Corruption Policy Statement

Approved by: Board & RCO Committee | Version: 1.1 | Effective date: 1 October 2026 | Next review: 1 October 2027

SH Professional Services Ltd (we, us, our) is committed to conducting our business honestly, ethically and with integrity. We take a zero-tolerance approach to bribery and corruption, and we are committed to acting professionally, fairly and in accordance with the Bribery Act 2010 in all our dealings, wherever we operate.

1. Purpose and scope

This statement sets out our commitment to preventing bribery and corruption and the standards we expect. It applies to everyone who works for or on our behalf, including directors, employees, contractors, agents and other associated persons. We also expect our clients, suppliers and business partners to share our commitment.

2. What we prohibit

We prohibit the offering, giving, promising, requesting, agreeing to receive or accepting of any bribe — that is, any financial or other advantage — to induce or reward the improper performance of a function or activity, or to influence a person in their official capacity. This includes bribery of, or by, any private person or company, and the bribery of foreign public officials.

- We do not make, and will not accept, facilitation payments or “kickbacks” of any kind.
- We do not offer or accept gifts or hospitality where they could improperly influence a decision, create an obligation, or be perceived to do so. Modest, proportionate and transparent gifts and hospitality given in the normal course of business are acceptable and must be recorded.
- Charitable and political donations are only made where lawful, transparent and properly authorised, and never as a way to obtain a business advantage.

3. Our procedures

In line with the six principles of the Ministry of Justice guidance under the Bribery Act 2010, we maintain procedures that are proportionate to the bribery risks we face. These comprise:

- proportionate procedures to prevent bribery by persons associated with us;
- top-level commitment from our directors to a culture in which bribery is never acceptable;
- periodic risk assessment of our exposure to bribery and corruption;
- due diligence on the people and organisations we work with;
- communication and training so that our people understand this policy; and
- monitoring and review of our procedures and their effectiveness.

4. Your responsibilities and raising concerns

Everyone acting for us must avoid any activity that might lead to a breach of this policy, and must report any suspected bribery or corruption. Concerns can be raised with a director, in confidence, without fear of retaliation. We will support anyone who raises a genuine concern, even if it turns out to be mistaken.

5. Consequences

A breach of this policy by an employee may result in disciplinary action up to and including dismissal. We may end our relationship with any contractor, agent or partner who breaches it. Bribery is a criminal offence that can result in imprisonment and unlimited fines for individuals and organisations.