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| Storefast Solutions Ltd | Document ref | CD020 |
| Anti-Bribery Policy | Page | 1 of 5 |
| | Revision no. | 2 |
| | Date | 27/03/2024 |
| | Approved by | E. Smith-Mensah |

This anti-bribery policy exists to set out the responsibilities of Storefast and those who work for us in regard to observing and upholding our zero tolerance position on bribery and corruption.

It also exists to act as a source of information and guidance for those working for Storefast. It helps them recognise and deal with bribery and corruption issues as well as understand their responsibilities.

Policy Statement - Storefast is committed to conducting business in an ethical and honest manner and is committed to implementing and enforcing systems that ensure bribery is prevented. Storefast has a zero tolerance for bribery and corrupt activities. We are committed to acting professionally, fairly and with integrity in all business dealings and relationships wherever in the country we operate.

Storefast will constantly uphold all laws relating to anti-bribery and corruption in all jurisdictions in which we operate. We are bound by the laws of the UK including the Bribery Act 2010 with regards to our conduct at home and abroad.

Storefast recognises that bribery and corruption are punishable by up to ten years of imprisonment and a fine, if our company is discovered to have taken part in corrupt activities we may be subjected to an unlimited fine and be excluded from tendering for public contracts and face serious damage to our reputation. It is with this in mind that we commit to preventing bribery and corruption in our business and take our legal responsibilities seriously.

This policy applies to all Storefast employees (temporary, fixed term, or permanent), contractors, trainees, home workers and agency staff.) In the context of this policy the third party refers to any individual or organisation that our company meets or works with. It refers to actual and potential clients, customers, distributors, business contacts, agents, advisers and government and public bodies.

Any arrangements our company makes with a third party is subject to clear contractual terms including specific provisions that require the third party to comply with minimum standards and procedures relating to anti-bribery and corruption.

Definition of Bribery - Bribery refers to an act of offering, giving, promising, asking, agreeing, receiving accepting, or soliciting something of value or of an advantage to induce or influence an action or decision.

A bribe refers to any inducement, reward, or object/ item of value offered to another individual to gain commercial or personal advantage.

Bribery is not limited to the act of offering a bribe. If an individual is on the receiving end of a bribe and they accept it they are also breaking the law.

What is not Acceptable - Storefast accepts normal and appropriate gestures of hospitality and goodwill if the gesture meets the following requirements.

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1. It is not made with intention of influencing the party to whom it is being given, to obtain any business advantage or as an explicit exchange for favours or benefits.
2. It is not made with the suggestion that a return favour is expected.
3. It is made in compliance with local law.
4. It is given in the name of the company not an individual.
5. It does not include cash or cash equivalent.
6. It is appropriate for the circumstances (i.e. Christmas gifts)
7. It is given openly.
8. It is not given selectively to a given to a key influential person with the intention of influencing them.
9. As good practice all gifts given and received should be disclosed to the manager. All gifts from suppliers should be disclosed.

The intention behind a gift given or received should always be considered. If there is any uncertainty the advice of the manager should be sought.

Facilitation Payments and Kickbacks - Storefast does not accept and will not make any form of facilitation payments of any nature. We recognise that these payments are a form of bribery that involves expediting or facilitating the performance of another individual with the intention of securing or speeding up the performance of a certain duty or action.

Storefast does not allow kickbacks to be made or accepted. We recognise that kickbacks are typically made in exchange for a business favour or advantage.

Storefast recognises that despite our strict policy on facilitation payments and kickbacks employees may face a situation where avoiding a payment may place their family's personal security at risk, under these circumstances the following steps must be taken.

1. Keep any amount to a minimum.
2. Ask for a receipt detailing amount and reason for payment.
3. Create a record concerning payment
4. Report incident to your supervisor/ Manager

Charitable Donations - Storefast accepts and encourages the act of donating to charity whether through services, knowledge time or direct cash contributions and agrees to disclose all contributions it makes.

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Employees must be careful to ensure that all charitable contributions are not used to facilitate and conceal acts of bribery.

We will ensure all donations are made legally under local laws and practices and that donations are made with the approval of the manager.

Employee Responsibilities

1. As a Storefast employee you must ensure you read and understand and comply with the information contained in this policy.
2. All employees and those under our control are equally responsible for the prevention, detection and reporting of bribery and other forms of corruption.
3. They are required to avoid any activities that could lead to or imply a breach of this anti-bribery policy.
4. If you have reason to believe that an instance has taken place or is about to occur that is about to cause a breach of this policy, you must notify the your manager.
5. 5. If any employee breaches this policy, they will face disciplinary action and could face dismissal for gross misconduct.

Storefast has the right to terminate a contract of any employee if they breach this anti-bribery policy.

What happens if I need to raise concern

1. How to raise Concern.

If you suspect, there is an instance of bribery or corrupt activities occurring in relation to Storefast you are encouraged to raise your concerns at as early stage as possible. If your uncertain about whether a certain action is considered bribery or corruption you should speak to your manager.

Storefast will familiarise all employees with its whistle blowing procedures so employees can vocalise their concerns swiftly and confidentially.

2. What to do if you're a victim of bribery or corruption.

You must tell the Manager as soon as possible if you are offered a bribe by anyone, if you are asked to make one, if you suspect that you may be bribed or asked to make a bribe in the near future or if you have reason to believe that you are a victim of another corrupt activity.

3. Protection.

If you refuse to accept or offer a bribe or you report a concern relating to potential acts of bribery and corruption Storefast understands that you may feel worried about potential repercussions. Storefast will support anyone who raises concerns in good faith under this policy even if investigation find that they were mistaken.

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Storefast will ensure that no one suffers any detrimental treatment because of refusing to accept or offer a bribe or other corrupt activities or because they reported a concern relating to potential acts of bribery or corruption.

Training and Communication - Storefast will provide training on this policy as part of the induction of all employees. Employees will receive regular relevant training on how to adhere to this policy and will be formally asked to comply with the policies contained in this document.

Storefast zero tolerance policy on bribery and corruption will be conveyed to all suppliers' contractors and business partners.

Record Keeping - Storefast will keep detailed and accurate financial records and will have appropriate internal controls to act as evidence for all payments made. We will declare and keep written record of the amount and reason for hospitality or gifts received or given and understand that gifts and hospitality are subject to managerial review.

Monitoring and reviewing – Storefast managers are responsible for monitoring the effectiveness of this policy and will review the implementation of it on a regular basis. Internal reviews on control systems and procedures designed to prevent bribery and corruption are subject to regular audits to ensure that they are affective in practise.

Any need for improvements will be applied as soon as possible.

This policy does not form part of an employee's contract and can be amended at any time.

Please sign to confirm you have read, understood, and can comply with these instructions:

Name

Signed

Date