

Anti-Bribery & Corruption Policy

Version 1.2 | Last reviewed 24 August 2026 | Signed: Edgar Cabrera, Managing Director

- 1. Policy Statement

Cleanfinity is committed to conducting all business dealings with honesty, integrity, and the highest ethical standards. We adopt a zero-tolerance approach to bribery and corruption and uphold all laws relevant to countering bribery in every jurisdiction we operate. This includes full compliance with the UK Bribery Act 2010.

We aim to prevent bribery in all forms, protect our reputation, and ensure our people, clients, and stakeholders can place full trust in how we operate.

- 2. Purpose

The purpose of this policy is to: - Publicly communicate Cleanfinity's zero-tolerance stance on bribery and corruption - Ensure all individuals and organisations associated with Cleanfinity understand their obligations - Comply with legal and ethical standards in all interactions and transactions

- 3. Scope

This policy applies to: - All Cleanfinity employees (full-time, part-time, temporary, or contractual) - Contractors, agents, consultants, interns, volunteers - Any third party or organisation representing or working with Cleanfinity

All parties are expected to always act in line with this policy.

Breaches of this policy may result in disciplinary action or termination of engagement, in accordance with applicable contracts and law.

- 4. What is Bribery?

Bribery involves offering, giving, receiving, or soliciting anything of value to gain a business, regulatory, or personal advantage that is dishonest, illegal, or in breach of trust.

Examples include: - Offering hospitality or cash to influence a tender outcome - Providing gifts to a government official to secure permits - Accepting kickbacks in exchange for awarding a subcontract

- 5. Prohibited Activities

Cleanfinity prohibits: - Offering or receiving bribes in any form - Promising or accepting gifts or hospitality with the expectation of undue advantage - Facilitation payments or kickbacks (unofficial payments to expedite routine actions) - Donations or sponsorships intended to improperly influence decisions - Threatening or punishing whistle-blowers or staff who refuse to engage in bribery

- 6. Responsibilities

All personnel must: - Always comply with this policy - Remain vigilant and report any suspicion of bribery - Avoid situations where personal interests could conflict with Cleanfinity's ethical standards

- Managers are responsible for: - Promoting awareness and compliance within their teams - Monitoring risk areas and supporting ethical business conduct
- 7. Raising Concerns

Anyone who suspects or is approached with a bribe must immediately report the matter to their line manager or director. Confidentiality and non-retaliation are guaranteed for all whistle-blowers.

Violations of this policy will be dealt with under Cleanfinity's disciplinary procedures and may result in dismissal and legal reporting.

- 8. Training and Communication

Cleanfinity provides training on bribery prevention to all employees. This policy is available to clients, suppliers, and stakeholders as part of our corporate responsibility programme.

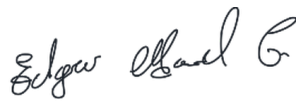
- 9. Monitoring and Review

This policy will be reviewed annually and updated as necessary to reflect changes in law, business practices, or risk exposure. All staff are responsible for ensuring ongoing compliance and flagging any concerns.

Document control

Owner	Cleanfinity Limited
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Signed



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