

Anti-Bribery and Corruption Policy

The Bribery Act 2010 makes it an offence to offer, promise or give a bribe. It is also an offence to request or agree to receive or accept a bribe.

A bribe is "a financial or other advantage offered or requested with the intention of inducing or rewarding improper performance of a relevant function or activity". It also applies where you "know or believe that acceptance would constitute improper performance of a function of activity".

It is Capital Sky policy to conduct our business in an open, honest and transparent way. We do not condone the use of corrupt practices or acts of bribery to obtain an unfair advantage. We adhere to the highest ethical standards and this is reflected in every aspect of the way in which we operate.

You must be alert to attempts to influence you inappropriately or to engage in/facilitate bribery. This is especially relevant to those procuring goods or services or dealing with third parties on our behalf. For instance, you may be offered excessive hospitality or gifts to facilitate business dealings. You must not accept any inducement designed to influence you inappropriately in the performance of your job.

Do not accept gifts from customers, suppliers, or any other person or organisation with whom we do (or might develop) business. This avoids any misunderstandings or allegations of impropriety. It is important you do not act inconsistently with our standards or, however inadvertently, impugn our integrity. Accepting a gift which influences, or seems to influence, your actions or decisions on our behalf may do this.

You must not accept money, gifts or other rewards from clients, suppliers, etc., contrary to our normal practices. Do not accept inappropriate levels of hospitality. Accepting lunch may be acceptable. Accepting a free holiday will not. If unsure, check first with your Line Manager.

You may accept small, genuine tokens of appreciation or gratitude which are commensurate with common practice in our organisation. They must be proportionate and reasonable and you must declare them to your Line Manager. You must not treat the person/organisation that provides such gifts more favorably than other clients, suppliers, etc. If unsure, check first with your Line Manager.

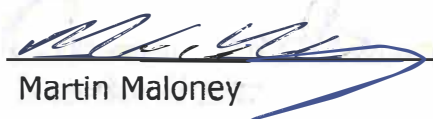
Where you are unsure, or feel refusal of a gift or hospitality might cause difficulty, consult your Line Manager first.

This policy does not apply to promotional items such as stationery. This is provided the items have no significant value.

We are committed to this policy and take a "zero tolerance" approach to any act of bribery or corruption by a member of staff. We view breaches as serious misconduct which, following investigation, may lead to disciplinary action. The penalty may include summary dismissal where we believe gross misconduct has taken place.

This policy will be reviewed from time to time and updated as required.

Signature



Martin Maloney

Director

Date 16/05/2023

Next Review 16/05/2024