



Policy ID: P13	Last Reviewed: 6 May 2026	Next Review: 10 January 2027	Version: 3.0
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ANTI-BRIBERY AND CORRUPTION POLICY

1. Introduction

MW Fire Ltd (The Company) values its reputation for ethical behaviour and for financial probity and reliability. It recognises that any involvement in bribery will reflect adversely on the image and reputation of this company.

The aim is to limit exposure to bribery by:

- setting out a clear anti-bribery policy
- establishing and implementing appropriate anti-bribery procedures
- communicating the policies and procedures to employees and to others who will perform services for the Company
- undertaking due diligence measures before engaging others to represent the Company in its business dealings
- monitoring and reviewing the risks and the effectiveness of the anti-bribery procedures that are in place herein

2. Our Commitment

The Company prohibits the offering, giving, solicitation or acceptance of any bribe (whether cash or other inducement):

- to or from any person or company (wherever they are situated and whether they are a public official or body or private person or company);
- by any individual employee, agent or other person or body acting on the Company's behalf;
- in order to gain any commercial, contractual or regulatory advantage for the Company in a way that is unethical;
- or, in order to gain any personal advantage (pecuniary or otherwise) for the individual or anyone connected with that individual.

This policy prohibits any inducement that results in a personal gain or advantage to the recipient or any person or body associated with them, and which is intended to influence them to take action that may not be solely in the interests of the Company.

This policy is not meant to prohibit normal and appropriate hospitality or the giving of a ceremonial gift, providing they are customary in a particular market, are proportionate and are declared to the Company.



Promotional gifts of low value such as branded stationery may be given to or accepted from existing customers, suppliers and business partners, without prior notification to the Company.

What is acceptable may not always be clear, so if there is any doubt as to whether a potential act constitutes bribery, the matter should be referred to the Company before acceptance of a gift.

3. Employees' Responsibility

The prevention, detection and reporting of bribery is the responsibility of all employees. The Company is committed to:

- encouraging employees to be vigilant and to report any suspicion of bribery;
- providing employees with suitable channels of communication and ensuring that sensitive information is treated appropriately;
- investigating instances of alleged bribery and assisting the police and other authorities in any resultant prosecution;
- and, taking disciplinary action against any individual(s) involved in bribery.

The Company expects all employees and associated persons acting on behalf of the Company to comply with this policy. Failure to comply may constitute a serious act of misconduct which could result in the dismissal of an employee or the cancellation of a contract with an associated person.

Any employee who raises a concern in good faith under this policy will be fully supported by the company, even if investigation finds that they were mistaken. No one will suffer dismissal, disciplinary action, or any other detrimental treatment as a result of refusing a bribe or reporting a concern relating to bribery or corruption.

4. Facilitation Payments

Facilitation payments are unofficial payments made to secure or speed up a routine action by a public official, such as clearing goods through customs or obtaining a permit. Such payments are illegal under the Bribery Act 2010 regardless of their size or the country in which they are made. **MW Fire Ltd** prohibits facilitation payments in all circumstances and employees must not make or agree to such payments on the company's behalf.

5. The Bribery Act 2010

The Act makes it a criminal offence for an individual to offer or accept a bribe and such an act is punishable by a fine and/or up to 10 years imprisonment. An offence is also committed by a commercial organisation if they fail to prevent a person associated with them from offering or accepting a bribe to gain advantage in the conduct of its business, for which the Company would become liable.

6. Policy Status

This policy does not form part of any employee's contract of employment. **MW Fire Ltd** reserves the right to amend it at any time.