

Aquam Document Ref No:	MA 005
Document Title:	Anti-Bribery and Corruption Policy
Revision No:	V2.5
Date of Issue:	01/03/2026
Next Planned Review	01/03/2027



Anti-Bribery and Corruption Policy

Aquam is committed to always conducting its business professionally and with honesty and integrity. The company strictly prohibits the offer or acceptance by any employee of any gift or bribe, whether or not such gift or bribe is in money or in any other form.

Bribery is the offering, promising, giving, accepting or soliciting of an advantage as an inducement for action which is illegal or a breach of trust. A bribe is an inducement or reward offered, promised or provided in order to gain any commercial, contractual, regulatory or personal advantage.

We will uphold all laws relevant to countering bribery and corruption in all the jurisdictions in which we operate. However, we remain bound by the laws of the UK, including the Bribery Act 2010, in respect of our conduct both at home and abroad.

To achieve this Aquam will:

- Not engage in any form of bribery or corruption.
- Not offer, provide, authorise, request or receive bribes or anything that could give the perception of being a bribe.
- Prohibit its employees, and associated persons from offering, making or paying any 'facilitation payments' to any third party including, but not limited to; foreign public officials. Aquam employees must report to the Managing Director any request by a third party for a facilitation payment.
- Not use funds or resources to contribute to any political campaign, political party, political candidate or any of their affiliated organisations with the intention of gaining a business or other advantage. Aquam will not use charitable donations as a substitute for political payments.
- Only make charitable contributions or sponsorships on behalf of or in the name of Aquam for legitimate charitable purposes and where the activities are aligned with Aquam's business objectives, values and ethical principles.
- Require that all directors and employees declare any benefits that they are offered or accept that they estimate would have cost the provider more than £200 per person to provide.
- Only engage with business partners who always demonstrate business integrity and who practice ethical conduct which meets the standards set out in this policy.

Aquam considers a breach of this policy as a serious offence. Any violation will result in disciplinary action, up to and including dismissal of an individual. Breach of the Bribery Act may lead to prosecution resulting in penalties including fines and/or imprisonment.

A handwritten signature in black ink, appearing to read 'Stuart Henderson'.

Signed: Stuart Henderson MD 1st March 2026