



# Anti-Bribery, Corruption & Anti-Competitive Practices Policy Statement

Introduced: July 2023

Next review date: July 2025

It is the policy of We Are Ease Ltd to conduct all our business in an honest and ethical manner. We take a zero-tolerance approach to bribery and corruption and are committed to acting professionally, fairly and with integrity in all our dealings wherever we operate. We are also committed to implementing and enforcing effective systems to counter bribery.

We furthermore take a zero-tolerance approach to anti-competitive practices, including colluding with competitors, suppliers or any other parties with the aim of influencing or fixing prices, bid rigging, participating or being involved with a cartel, using a position of advantage to interfere with or exclude the activities of another business, or any other practice which is intended to or which has the effect of reducing free competition in any market place.

This policy applies to all individuals working at all levels and grades, including senior managers, directors, employees (whether permanent, fixed-term or temporary), consultants, contractors, and any other person providing services to us.

A bribe is a financial or other advantage offered or given:

- to anyone to persuade them to or reward them for performing their duties improperly; or
- to any public official with the intention of influencing the official in the performance of his duties.

This policy does not prohibit giving and receiving promotional gifts of low value and normal and appropriate hospitality. However, in certain circumstances gifts and hospitality may amount to bribery and all employees must comply strictly with the company ethics policy in respect of gifts and hospitality. We will not provide gifts or hospitality with the intention of persuading anyone to act improperly or to influence a public official in the performance of his duties.

We do not make, and will not accept, facilitation payments or “kickbacks” of any kind. Facilitation payments are typically small, unofficial payments made to secure or expedite a routine government action by a government official. Kickbacks are typically payments made in return for a business favour or advantage. All employees must avoid any activity that might lead to, or suggest, that a facilitation payment or kickback will be made or accepted by us.

We do not make contributions of any kind to political parties. No charitable donations will be made for the purpose of gaining any commercial advantage.

We will keep financial records and have appropriate internal controls in place which will evidence the business reason for making any payments to third parties.

All expense claims relating to hospitality, gifts or expenses incurred to third parties must be submitted



We Are Ease Ltd, The Pavilion, Moorhaven, Bittaford, Ivybridge, Devon, PL21 0TZ

Company Reg No.: 10436920. VAT No.: 257842767. Reg. Address: c/o Mark Holt & Co, 7 Sandy Court, Ashleigh Way, Langage Business Park, Plymouth, PL7 5JX

in accordance with our expenses policy and specifically record the reason for the expenditure.

All accounts, invoices, memoranda and other documents and records relating to dealings with third parties, such as clients, suppliers and business contacts, must be prepared and maintained with strict accuracy and completeness. No accounts must be kept "off-book" to facilitate or conceal improper payments.

We ensure all new business is procured in a responsible and ethical manner. None of our actions in winning new business will have an impact on the open, healthy and free competition expected in any market. And we will maintain the records to demonstrate this.

Employees will be encouraged to raise concerns about any issue or suspicion of malpractice at the earliest possible stage through the We Are Ease Ltd Whistleblowing Policy. No employee will suffer any detriment as a result of raising genuine concerns about bribery, corruption or anti-competitive actions even if they turn out to be mistaken. Suppliers, who do not have their own policies/processes in place will be encouraged to comply with We Are Ease Ltd's Anti-Bribery, Corruption and Anti-Competitive Practices Policy Statement.

The effectiveness of this policy will be regularly reviewed by the Directors. Internal control systems and procedures will be subject to audit under the internal audit process. Dependent upon the seriousness of the breach the enforcing authority may be called upon to deal with any significant issues.

Signed:  ..... Date: 22/6/23      Signed:  ..... Date: 22/6/23 .

Andy Cook, We Are Ease Ltd Director                      Dafydd Hollyman, We Are Ease Ltd Director



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