



Anti-Bribery Policy Statement

Definitions

Bribery is the offering or accepting of any gift, loan, payment, reward or advantage for person gain as an encouragement to do something which is dishonest, illegal or a breach of trust. Datalink Electronics Ltd prohibits any form of bribery. We insist compliance, from everyone connected with our business, with the highest ethical standards and anti-bribery laws applicable. Integrity and transparency are of upmost importance to us, and we have a zero-tolerance attitude towards corrupt activities of any kind, whether committed by an employee or by a third party acting for or on behalf of Datalink Electronics Ltd.

Purpose

The purpose of this policy is to convey to all employees and interested parties the rules of the Company in relation to our unequivocal stance towards the eradication of bribery and our commitment to ensuring that Datalink Electronics Ltd conducts its business in a fair, professional and legal manner.

Offences

It is a criminal offence to:

- Offer a bribe.
- Accept a bribe.
- Bribe a foreign official.
- As a commercial organisation, to not prevent a bribe.

You should be aware that if you are found guilty of committing bribery, you could face up to 10 years in prison and/or an unlimited fine. Datalink Electronics Ltd could also face prosecution and be liable to pay a fine.

Scope

Corruption is the misuse of office or power for private gain. Bribery is a form of corruption which means in the course of business giving or receiving money, gifts, meals, entertainment or anything else of value as an inducement to a person to do something which is dishonest or illegal. This policy applies to all employees, regardless of seniority or site. It also extends to anyone working for or on our behalf e.g. those engaged by us on a self-employed basis or an agency arrangement.

Policy

It is prohibited, directly or indirectly, to offer, give, request or accept any bribe to or from any person or company in order to gain commercial, contractual or regulatory advantages for the Company, or to gain any personal advantage for an individual or anyone connected with the individual in a way that is unethical. It is also prohibited to act in the above manner to influence an individual in his role as a foreign public official. You should not make a payment to a third party on behalf of a foreign public official.

If you are offered a bribe, or a bribe is solicited from you, you should not agree to it unless your safety is in jeopardy. You should immediately contact a Director so that action can be taken if considered necessary. If you, as an employee or person working on our behalf, suspects that an act of bribery, or attempted bribery, has taken place, even if you are not personally involved, you are expected to report this to a Director. You may be asked to give a written account of events.

Appropriate checks will be made before engaging with Suppliers or third parties of any kind to reduce the risk of our business partners breaching our anti-bribery rules.





Datalink Electronics Ltd will ensure that all its transactions, including any sponsorship or donations given to charity, are made transparently and legitimately.

We take any actual or suspected breach of this policy extremely serious and will conduct a thorough investigation should any instances arise. We will uphold laws relating to bribery and will take disciplinary action against any employee, or other relevant action against any person working on our behalf or in connection with us, should be found that an act of bribery, or attempted bribery, has taken place. This action may result in your dismissal if you are an employee, or the cessation of our arrangement with you if you are self-employed, an agency worker, contractor etc.

Employees are reminded of the Company's whistleblowing policy, which is available in the employee Handbook, or upon request.

Gifts and Hospitality

We realise that the giving and receiving of gift and hospitality where nothing is expected in return helps form positive relationships with third parties, where this is proportionate. This is not bribery; therefore, such actions are not considered a breach of this policy.

Gifts include money, foods, services or loans given or received as a mark of friendship or appreciation.

Hospitality includes entertaining, meals or event tickets given or received to initiate or develop relations. Hospitality will become a gift if the host is not present.

No gift should be given nor hospitality offered by an employee or anyone working on our behalf to any party in connection with our business without receiving written approval from a Director.

This Anti-Bribery Policy Statement will be reviewed for each financial year and revised as necessary to reflect changes to the business activities and any changes to legislation. Any changes to the Policy will be brought to the attention of all employees.

NAME: Mariam Smith

SIGNED: *Mariam Smith*

POSITION: Managing Director

DATE: 01/04/2025

