



## Anti-Bribery and Corruption Policy

### 1. POLICY STATEMENT

Datalink Electronics Ltd operates a zero-tolerance approach to bribery and corruption. The Company is committed to conducting all business with integrity, transparency and in full compliance with applicable legislation, including the UK Bribery Act 2010.

Bribery in any form is prohibited. This applies to all employees and any individual or organisation acting on behalf of the Company.

### 2. PURPOSE

The purpose of this policy is to:

- Define the Company's position on bribery and corruption
- Ensure all employees understand their responsibilities
- Provide clear guidance on acceptable conduct
- Protect the Company and its employees from legal, financial, and reputational risk

### 3. SCOPE

This policy applies to:

- All employees, including Directors and Managers
- Contractors, consultants, and agency workers
- Third parties acting on behalf of the Company
- All countries where the Company operates, regardless of local customs

### 4. DEFINITION OF BRIBERY AND CORRUPTION

Bribery is defined as offering, promising, giving, requesting, or accepting any financial or other advantages to improperly influence a decision or action.

Corruption is the misuse of entrusted power or position for personal or business gain.

### 5. PROHIBITED ACTIVITIES

It is strictly prohibited to:

- Offer, promise or give a bribe
- Request, agree or accept a bribe
- Bribe a foreign public official
- Facilitate or fail to prevent bribery within the business
- Offer or accept anything of value that could improperly influence a decision

### 6. FACILITATION PAYMENTS

Facilitation payments (small payments made to expedite routine processes) are prohibited, regardless of local custom or practice.

### 7. GIFTS AND HOSPITALITY

The Company recognises that reasonable gifts and hospitality may support business relationships but must not influence decisions. All gifts and hospitality must:

- Be reasonable, proportionate, and appropriate
- Be given openly and transparently
- Have a legitimate business purpose
- Not create any expectation of favour or advantage





The following are prohibited and not allowed:

- Cash or cash-equivalent gifts
- Gifts during tender or contract negotiations
- Excessive, frequent, or lavish hospitality

Approval Thresholds	
Up to £50	Line Manager approval
£50 - £200	Director approval
Over £200	Director approval + justification

All items must receive prior written approval where required.

### 8. THIRD-PARTY RELATIONSHIPS

The Company is committed to maintaining high ethical standards in all business relationships. Before engaging suppliers, contractors or third parties, the Company will:

- Conduct background and reputational checks
- Assess risk level, including geographic and sector risks
- Ensure contracts include anti-bribery clauses
- Perform sanctions and compliance screening

Ongoing monitoring will be conducted regularly to ensure continued compliance with this policy.

### 9. RED FLAGS

Employees must remain alert to potential indicators of bribery, including:

- Requests for unusual or cash payments
- Excessive commissions or fees
- Lack of transparency in transactions
- Refusal to agree to compliance terms
- Pressure to bypass procedures

Any red flags must be reported immediately.

### 10. RESPONSIBILITIES

All employees must:

- Comply fully with this policy
- Exercise good judgement and professional integrity
- Avoid any activities that could lead to a breach
- Report suspicions or incidents promptly

Managers must:

- Promote awareness within their teams
- Ensure understanding and compliance
- Monitor behaviour and escalate concerns

All individuals are personally responsible for preventing, detecting, and reporting bribery.

### 11. REPORTING CONCERNS

Employees must report any suspected or actual bribery immediately. Reports can be made to a Director or via the Company’s whistleblowing process. Reports may be made verbally or in writing and will be treated confidentially. The Company prohibits retaliation against anyone who raises concerns in good faith.





## 12. TRAINING AND AWARENESS

All employees will receive anti-bribery training appropriate to their role. Refresher training will be provided periodically. High-risk roles may receive enhanced training.

## 13. BREACHES OF THIS POLICY

Breaches of this policy will be treated as serious disciplinary matters and may result in:

- Disciplinary action, up to and including dismissal for gross misconduct
- Termination of contracts with third parties
- Referral to law enforcement authorities where appropriate

Individuals may face criminal prosecution, fines, and/or imprisonment.

## 14. MONITORING AND REVIEW

This policy will be reviewed annually to ensure continued compliance with legal and regulatory requirements.

**NAME:** Mariam Smith

**SIGNED:** *Mariam Smith*

**POSITION:** Managing Director

**DATE:** 01/04/2026

