



Anti-Bribery & Corruption Policy

Silver Blaze Ltd are committed to implementing and enforcing effective systems to counter bribery. Therefore, it is the Company's policy to conduct all aspects of its business in an honest and ethical manner at all times.

This applies to all permanent and fixed-term staff employed by the Company, and any contractors, consultants or other persons acting under or on behalf of the Company.

Silver Blaze Ltd Responsibility

Silver Blaze Employees will not:

- Make contributions of any kind with the purpose of gaining any commercial advantage.
- Provide gifts or hospitality with the intention of persuading anyone to act improperly or to influence a public official in the performance of their duties.
- Make, or accept, "kickbacks" of any kind.

The Company will:

- Keep appropriate internal records that will evidence the business reason for making any payments to third parties.
- Encourage employees to raise concerns about any issue or suspicion of malpractice at the earliest possible stage.
- See that anyone raising a concern about bribery will not suffer any detriment as a result, even if they turn out to be mistaken.

Employee Responsibility

Employees must not:

- Accept any financial or other reward from any person in return for providing some favor.
- Request a financial or other reward from any person in return for providing some favor.
- Offer any financial or other reward from any person in return for providing some favor.

Gifts and Hospitality:

- This policy does not prohibit giving and receiving promotional gifts of low value, or normal and appropriate hospitality.



Receiving Business gifts:

- Receiving promotional gifts of low value is normal and appropriate; however, gifts with a value exceeding £25.00 may not be accepted without approval. Any gift offered and then refused because of its value, must be reported to The Company.

Offering Business gifts:

- Business gifts are primarily aimed at thanking customers and suppliers for their custom and loyalty, only authorised gifts may be given.

Receiving Hospitality:

- The acceptance of corporate hospitality must be transparent; all invitations must be reported to the company before an employee accepts any invitation.

The following areas are exempt while attending conferences, seminars, sponsored by third parties.

- Business and travel expenses incurred.
- Normal business lunches and meals.

Offering gifts and hospitality:

- Company hospitality is primarily aimed at thanking customers and suppliers for their custom and loyalty. All hospitality events must have approval.

Donations to organisations:

- No donations should be made to charities, political parties or other organisations without approval.

Non-Compliance:

Staff failing to observe Company policy may lead to disciplinary action in accordance with the Company's Disciplinary Policy.

A handwritten signature in blue ink, appearing to read "Ciaran O'Duffy", is written over a light blue horizontal line.

Ciaran O'Duffy
Managing Director
28.06.24