


TUTELA GROUP

POLICY DOCUMENT

ANTI CORRUPTION
& BRIBERY POLICY



Anti-Corruption and Bribery Policy

1. Purpose and Scope

This policy sets out The Tutela Group's zero-tolerance approach to bribery and corruption. It applies to all directors, employees, contractors, consultants, and agents acting on behalf of The Tutela Group, regardless of location or role. The Tutela Group is committed to conducting its business—encompassing construction, fit out, refurbishment, facilities maintenance, and special projects—in an ethical, transparent, and legally compliant manner.

2. Policy Statement

The Tutela Group strictly prohibits any form of bribery or corruption. No employee or associated party may, directly or indirectly, offer, promise, give, accept, or solicit any undue advantage, gift, payment, or favor that could be construed as a bribe or as facilitating corrupt practices. All business dealings must be conducted with integrity and in accordance with applicable local and international laws, including but not limited to the U.S. Foreign Corrupt Practices Act (FCPA) and the UK Bribery Act.

3. Definitions

Bribery: The offering, giving, receiving, or soliciting of anything of value to influence a business decision improperly.

Corruption: The abuse of entrusted power for private gain.

Facilitation Payments: Small, unofficial

payments made to secure or expedite the performance of a routine governmental action; these are strictly prohibited.

Gifts and Hospitality: Any item, favor, or service given or received that might influence decision-making or create a conflict of interest. Such gestures must be reasonable, proportionate, and transparently recorded.

4. Prohibited Practices

Direct and Indirect Bribery: No employee or representative of The Tutela Group shall engage in bribery in any form.

Facilitation Payments: These are not permitted under any circumstances.

Gifts and Hospitality: Any gift or hospitality offered or accepted must be modest, infrequent, and appropriate to the context. Excessive or lavish gifts and entertainment are strictly forbidden, as they may be seen as an attempt to improperly influence decisions.

Political and Charitable Contributions: All contributions must comply with applicable laws and should not be used as a means to gain an improper advantage.

5. Responsibilities

Employees and Associates: Must ensure that all actions comply with this policy and applicable legal standards. Any uncertainty regarding an action's appropriateness should be promptly escalated to a supervisor or the compliance department.

Management: Responsible for

fostering a culture of transparency and ethical behaviour by ensuring all staff understand and adhere to this policy.

Compliance Department: Will provide regular training, guidance, and monitoring to ensure adherence to this policy, and will review and update the policy as necessary.

6. Reporting and Whistleblowing

Employees, contractors, or other stakeholders who suspect or become aware of any breach of this policy must report their concerns immediately through the established internal channels. The Tutela Group will treat all reports confidentially and will protect individuals from retaliation. All reports will be investigated promptly and, where appropriate, remedial actions will be taken.

7. Record Keeping

All financial records, including those relating to gifts, hospitality, and any potential political or charitable contributions, must be maintained accurately and transparently. Such records will be subject to internal audits and, if necessary, external regulatory reviews to ensure compliance with this policy.

8. Training and Communication

The Tutela Group will ensure that all employees and relevant third parties receive appropriate training on anti-corruption and bribery measures. Regular updates and communications regarding legal obligations and best practices will be provided to maintain awareness and compliance.

9. Consequences of Non-Compliance

Any breach of this policy may result in severe disciplinary action, including termination of employment, contractual penalties, and legal proceedings. The Tutela Group is committed to enforcing this policy rigorously to maintain its integrity and public trust.

10. Monitoring and Review

This policy will be reviewed periodically by the compliance department to ensure its continued effectiveness and to incorporate any necessary changes in legal or business requirements. Feedback and suggestions for improvement are welcome as part of our commitment to continuous improvement.

Approved by: Robert Taylor

Position: Managing Director

Effective Date: 17/11/25

Next Review Date: 17/11/26

This policy embodies The Tutela Group's commitment to ethical business practices and to the prevention of corruption in all its operations.

TUTELA GROUP



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