

PURPOSE

The purpose of this policy is to set out I-Cubed Group's position on bribery and corruption, in line with the UK Bribery Act 2010. We are committed to conducting business ethically and with integrity, and we take a zero-tolerance approach to bribery and corruption. This policy outlines our responsibilities to comply with laws concerning bribery, and provides guidelines on how to recognise and handle bribery risks.

SCOPE

This policy applies to all employees, officers, consultants, contractors, and any other third parties working on behalf of I-Cubed Group Ltd. It covers activities in all markets in which we operate, both in the UK and internationally.

This policy will be shared with everyone and adherence and compliance will be monitored by our Chief Executive Team and will be reviewed on an annual basis or as needed in line with changes to legislation or business process.

DEFINITION OF BRIBERY AND CORRUPTION

Bribery: Offering, promising, giving, or accepting any undue advantage in order to influence someone's actions or decisions in a way that is considered illegal or unethical. Bribery can take many forms, such as: monetary payments, gifts, entertainment, or hospitality beyond reasonable and customary practices. favours (such as offering a job, contract, or benefit to a family member).

Corruption: The abuse of entrusted power for private gain.

PROHIBITED ACTIONS

We explicitly prohibit:

- Offering, giving, soliciting, or receiving bribes in any form.
- Bribing or attempting to bribe a public official.
- Making or accepting facilitation payments, even if these are considered a common practice in certain countries.

GIFTS, HOSPITALITY, AND ENTERTAINMENT

Gifts and hospitality are allowed within reasonable and modest limits, provided they:

- Are not offered with the intent to influence or induce improper conduct.
- Are not excessive or inappropriate.
- Are approved, recorded, and transparent.

If an employee is offered a gift or hospitality that exceeds the acceptable threshold (typically £50, unless otherwise stated by the company), it must be declared and recorded with the compliance officer or management.

Examples of Prohibited Gifts and Hospitality:

- Lavish or extravagant gifts.
 - Excessive or frequent hospitality.
 - Gifts during a tender or contract negotiation.
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FACILITATION PAYMENTS

Facilitation payments, which are unofficial, small payments to expedite routine actions (e.g. processing paperwork, issuing permits), are illegal under the Bribery Act and are strictly prohibited.

THIRD-PARTY RELATIONSHIPS AND DUE DILIGENCE

We are committed to ensuring that all third parties, including suppliers, contractors, agents, and business partners, do not engage in any form of bribery. Prior to engaging with third parties, the company will:

- Conduct appropriate due diligence to assess the bribery risk.
 - Ensure that contracts with third parties contain appropriate anti-bribery clauses.
 - Monitor the conduct of third parties regularly.
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Responsibilities

Management:

- Ensure effective implementation of this policy.
- Conduct periodic risk assessments of the company's exposure to bribery.
- Provide training and communication to employees.

Employees:

- Read, understand, and comply with this policy.
 - Report any concerns, suspicions, or breaches of this policy to management.
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REPORTING AND WHISTLEBLOWING

I-Cubed Group Ltd encourages all employees and third parties to report any concerns or suspicions of bribery or corruption. Reports should be made through the confidential email channel: Sebastian@i-cubed.co.uk.

We guarantee confidentiality and will protect whistleblowers from retaliation or victimisation.

PENALTIES AND DISCIPLINARY ACTION

Any employee or third party found to be involved in bribery or corruption will face severe disciplinary action, including potential dismissal and legal prosecution. Under the Bribery Act 2010:

- Individuals can face up to 10 years in prison and an unlimited fine.
 - Companies can face unlimited fines and significant reputational damage.
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TRAINING AND COMMUNICATION

Regular training will be provided to all employees to ensure they understand this policy, the UK Bribery Act, and their obligations. The policy will also be made available to all employees and third parties.

MONITORING AND REVIEW

This policy will be reviewed annually or in response to any significant changes in the law or our business operations. The effectiveness of anti-bribery procedures will be monitored, and the policy will be updated accordingly.

ACKNOWLEDGMENT

Employees must sign the acknowledgment form to confirm that they have read and understood the Anti-Bribery Policy.

Acknowledgment Form:

I, [Employee Name], hereby acknowledge that I have read and understood I-Cubed Group Ltd Anti-Bribery Policy and agree to comply with its terms.

Signed:

Date:

Position: