

# cadventure

## Bribery and Corruption Prevention Policy

Cadventure has zero-tolerance for bribery. Cadventure fosters within its team, but also in its relationships with external stakeholders, an ethical culture aiming at reaching the highest standards in terms of responsibility and business integrity.

The purpose of this Policy is to establish guidance for Cadventure Employees and Third Parties interacting with Cadventure to comply with applicable Anti-corruption and Antibribery Laws and Regulations, as well as to promote a culture of ethics and integrity.

This policy also aims at protecting Cadventure and our staff's reputation and at avoiding potential civil and criminal fines.

Cadventure do business in the UK and but work with global organisations in the procurement of software and services on behalf of our clients. We have assessed the risk associated with bribery and corruption in this context.

In order to prevent bribery, Cadventure has the following procedures in place:

1. Top-level level commitment to preventing bribery fostering a culture within the organisation in which bribery is not acceptable, This is specifically defined as gross misconduct and grounds for dismissal in our disciplinary procedure.
2. Due diligence procedures, taking a proportionate and risk-based approach, with regard to the individuals who perform or will perform services for or on behalf of the organisation and our clients. This includes research and the vetting of new suppliers.
3. Induction and ongoing training and education of staff about bribery prevention policies and procedures.
4. Robust enquiry to cash processes to simplify, make transparent and streamline commercial transactions
5. Spot checks on transactions and oversight by senior management and peer review of transactions and client / supplier relations.
6. Continuous assessment of the nature and extent of our exposure to potential external and internal risks of bribery on its behalf and by people associated with Cadventure. The assessment is periodic, informed and documented.

Anything of value that could be construed as a bribe may include, but is not limited to:

- Cash,
- Gifts,
- Entertainment, accommodations, and meals except in the normal course of subsistence for business
- Travel expenses,
- Services,
- Employment offers,
- Loans,
- Donations or contributions, and
- Any other transfer of value, even if nominal in value.

Signed:        Date: 2<sup>nd</sup> December 2021



Elaine Lewis  
**Managing Director**