ANTI-BRIBERY AND CORRUPTION POLICY

Company Name: Adjacent Digital Politics Ltd
Effective Date: 26th October 2026

1. Policy Statement

Adjacent Digital Politics ltd is committed to conducting all business activities fairly, honestly, transparently and in accordance with applicable laws.

We adopt a zero-tolerance approach to bribery and corruption and are committed to maintaining the highest standards of professional conduct in our dealings with customers, suppliers, employees, contractors and other business partners.

We do not offer, promise, give, request, agree to receive or accept bribes or other improper inducements to obtain or retain business or secure an unfair commercial advantage.

This policy reflects our commitment to complying with the Bribery Act 2010 and promoting ethical business practices throughout our operations.

2. Scope

This policy applies to our business activities and dealings with:

- Customers and prospective customers.
- Suppliers and service providers.
- Contractors, consultants and freelancers.
- Business partners and other third parties acting on our behalf.
- Public officials and representatives of public bodies, where relevant.

We expect individuals and organisations acting on our behalf to conduct themselves in a manner consistent with the principles set out in this policy.

3. Prohibition of Bribery and Corruption

Adjacent Digital Politics Ltd prohibits all forms of bribery and corruption, whether involving public officials or individuals and organisations in the private sector.

Bribery includes offering, promising, giving, requesting or accepting a financial or other advantage with the intention of inducing or rewarding improper performance or influencing a decision improperly.

Examples of prohibited conduct include:

- Offering money, gifts or other benefits to influence a customer's purchasing decision improperly.
- Accepting an improper payment in return for awarding work or contracts.
- Offering undisclosed incentives or personal benefits to influence a business relationship.
- Making facilitation payments to secure or accelerate routine actions improperly.

- Using an intermediary or third party to offer or accept a bribe on our behalf.
- Providing gifts, hospitality or entertainment intended to influence a business decision improperly.

We will not knowingly participate in, facilitate or condone such conduct.

4. Gifts and Hospitality

We recognise that reasonable and proportionate gifts and hospitality may form part of legitimate business relationships.

However, gifts, entertainment, hospitality and other business courtesies must never be offered or accepted to influence a business decision improperly or create an obligation to provide preferential treatment.

Any gifts or hospitality associated with our business must be lawful, appropriate, proportionate and transparent.

Particular care must be taken during tender processes, contract negotiations, supplier selection and other situations where impartial business decisions are essential.

We reserve the right to decline any gift, payment or hospitality that could reasonably be perceived as an attempt to influence our business activities improperly.

5. Conflicts of Interest

We expect business decisions to be made objectively and in the legitimate interests of Adjacent Digital Politics Ltd and its customers.

Employees and individuals acting on our behalf must disclose actual or potential conflicts of interest that could improperly influence their professional judgement.

Personal relationships, financial interests or outside business arrangements must not be used to secure improper advantages in commercial dealings.

Where a conflict is identified, appropriate steps will be taken to manage it.

6. Customers, Suppliers and Third Parties

We are committed to maintaining transparent and ethical relationships with our customers, suppliers and business partners.

Where appropriate and proportionate to the risks involved, we may undertake due diligence on third parties acting on our behalf or supporting our business activities.

We expect our business partners to:

- Comply with applicable anti-bribery and corruption legislation.
- Conduct business honestly and transparently.
- Avoid offering or accepting improper payments or inducements.
- Maintain appropriate standards of professional conduct.
- Raise concerns about suspected bribery or corruption.

Where credible concerns arise, we may investigate the circumstances and take appropriate action, which may include suspending or terminating a business relationship where justified.

7. Financial Transparency and Business Records

Adjacent Digital Politics Ltd is committed to maintaining accurate and transparent financial and business records.

Payments, expenses, commissions and other transactions must be properly documented and supported by appropriate records.

We do not permit false, misleading or incomplete entries to conceal improper payments or other unethical conduct.

Payments to third parties should reflect legitimate business arrangements and be supported by appropriate documentation.

8. Reporting Concerns

Customers, suppliers, employees, contractors and other stakeholders are encouraged to report suspected bribery, corruption or breaches of this policy.

Reports should be directed to:

Contact: Stephanie Davies – General Manager
Email: sdavies@openaccessgovernment.org

All concerns will be taken seriously and assessed appropriately.

We will handle reports sensitively and share information only where appropriate and necessary, subject to applicable legal obligations.

We do not tolerate retaliation against anyone who raises a concern in good faith.

9. Breaches and Consequences

Any suspected breach of this policy will be assessed and, where appropriate, investigated.

Depending on the circumstances, action may include:

- Taking corrective measures.
- Reviewing or suspending a transaction or business arrangement.
- Terminating a contractual or commercial relationship where justified.
- Taking appropriate disciplinary action in accordance with applicable procedures.
- Reporting suspected criminal conduct to the relevant authorities where appropriate or legally required.

Nothing in this policy limits any legal rights or obligations arising under applicable law or contractual arrangements.

10. Responsibilities and Oversight

The directors or senior management of Adjacent Digital Politics Ltd are responsible for overseeing the implementation of this policy.

We are committed to promoting awareness of anti-bribery requirements and maintaining procedures proportionate to the nature, scale and risks of our business.

Employees and individuals acting on our behalf are expected to understand and comply with the requirements relevant to their roles.

11. Monitoring and Review

This policy will be reviewed at least annually and whenever significant changes to our business activities, risk profile or applicable legal requirements make an earlier review appropriate.

We will seek to maintain and improve our approach to preventing bribery and corruption as our business develops.

12. Approval

This policy has been approved by the management of Adjacent Digital Politics Ltd.

Approved by: Stephanie Davies

Signature: *Sdavies*

Date: 26.10.26

Policy status: This document communicates Adjacent Digital Politics Ltd's approach to preventing bribery and corruption. It should be read alongside any applicable contractual terms and other relevant company policies.