



Anti-Fraud, Bribery and Corruption Policy

Company: Safestream Water and Air Ltd

1. Purpose

This policy sets out Safestream Water and Air Ltd's commitment to preventing fraud, bribery and corruption in all business activities. It provides guidance on recognising, preventing and reporting such activities to ensure compliance with the Bribery Act 2010 and other applicable laws.

2. Scope

This policy applies to all employees, directors, officers, contractors, agents, consultants, suppliers and business partners acting on behalf of Safestream Water and Air Ltd in any country.

3. Policy statement

Safestream Water and Air Ltd has a zero-tolerance approach to fraud, bribery and corruption. We are committed to acting professionally, fairly and with integrity in all business dealings and relationships. Any form of bribery, fraud, facilitation payments or corrupt practices is strictly prohibited.

4. Definitions

- Fraud: Wrongful or criminal deception intended to result in financial or personal gain.
- Bribery: Offering, giving, receiving, or soliciting something of value as an inducement to influence an action or decision.
- Corruption: Abuse of entrusted power for private gain.
- Facilitation payment: A small payment made to secure or speed up a routine government action. These are prohibited.

5. Legal framework

This policy supports compliance with the UK Bribery Act 2010, the Fraud Act 2006, the Proceeds of Crime Act 2002, and other applicable anti-corruption laws. Failure to comply can result in severe penalties, including fines and imprisonment, as well as reputational damage to the company.

6. Responsibilities

- The Board of Directors has overall responsibility for ensuring this policy complies with legal and ethical obligations.
- Managers are responsible for implementing the policy within their teams.
- Employees must comply with this policy and report any suspected breach.
- The Compliance Officer is responsible for monitoring, training, and investigation.

7. Risk assessment & due diligence

Safestream Water and Air Ltd will assess the risk of fraud, bribery and corruption in its operations and supply chains, conduct proportionate due diligence on third parties, and apply enhanced scrutiny in high-risk situations.

8. Prohibited activities

- Offering or accepting bribes in any form.
- Making facilitation payments.
- Engaging in fraudulent activities, such as falsifying records or misappropriating assets.
- Engaging in corrupt practices, including nepotism, collusion or abuse of authority.

9. Gifts and hospitality

Reasonable and proportionate gifts and hospitality may be acceptable if they are transparent, infrequent, and intended to improve business relationships, not influence decisions. Any gift or hospitality must be recorded in the company's register.

10. Reporting concerns

Employees must report suspected fraud, bribery or corruption immediately through the company's Whistleblowing Procedure, to their line manager, or directly to the Compliance

Officer. Reports will be treated confidentially and investigated promptly. Safestream Water and Air Ltd prohibits retaliation against whistleblowers.

11. Training and communication

Safestream Water and Air Ltd will provide regular training to employees on recognising and preventing fraud, bribery and corruption. This policy will be communicated to suppliers, contractors and business partners.

12. Monitoring and review

The Compliance Officer will monitor the effectiveness of this policy, review it annually, and report to the Board. Improvements will be made where necessary to address evolving risks.

13. Consequences of breach

Any employee who breaches this policy will face disciplinary action, which may include dismissal for gross misconduct. Safestream Water and Air Ltd may terminate relationships with suppliers, contractors or partners who breach this policy.

Approved by:

George Taylor / David Whatmough

Directors

30/08/2025

Two handwritten signatures in black ink. The first signature, on the left, is 'G Taylor' written in a cursive style. The second signature, on the right, is more stylized and appears to be 'D Whatmough'.