Anti-Bribery & Corruption Policy 26-27

September 2026

Policy Statement
The Bribery Act 2010 came into force on 1 July 2011 and creates a framework of five criminal offences:

- Giving, promising, and offering of a bribe
- Agreeing to receive or accept a bribe
- Bribing a foreign official
- Failure of commercial organisations to prevent bribery
- A senior officer of a commercial organisation consenting to or conniving in an act of bribery

Paradigm Arts will conduct business in an honest and ethical manner. Paradigm Arts takes a zero-tolerance approach to bribery and corruption and is committed to acting professionally, fairly and with integrity in all its business dealings and relationships, wherever it operates, and implementing and enforcing effective systems to counter bribery.

Paradigm Arts will uphold all laws relevant to countering bribery and corruption in all the jurisdictions in which it conducts business, including, in the UK, the Bribery Act 2010, which applies to conduct both in the UK and abroad.

Scope
All Paradigm Arts employees, board members and others acting on behalf of Paradigm Arts must comply with this Anti-Bribery and Corruption Policy and it extends to all business dealings and transactions in the UK. It is essential that Paradigm Arts conducts an effective process of due diligence prior to entering into significant business relationships and that a record is kept of this process.

Any breach of the policy is likely to constitute a serious disciplinary, contractual and criminal matter for the individual concerned. This could constitute gross misconduct for which an offending employee may be dismissed without notice. It may also cause serious damage to the reputation and standing of Paradigm Arts.

Gifts and hospitality

This policy does not prohibit normal and appropriate gifts and hospitality (given and received) to or from Third Parties unless otherwise specifically stated. However, any gift or hospitality:

- must not be made with the intention of improperly influencing a Third Party or Worker to obtain or retain business or a business advantage, or to reward the provision or retention of business or a business advantage, or in explicit or implicit exchange for favours or benefits;
- must comply with local law in all relevant countries;
- must be given in the name of the organisation, not in an individual's name;
- must not include cash or a cash equivalent;
- must be appropriate in the circumstances;
- must be of an appropriate type and value and given at an appropriate time taking into account the reason for the gift; and
- must be given openly, not secretly.

Paradigm Arts appreciates that the practice of giving business gifts varies between countries and regions and what may be normal and acceptable in one region may not be in another. The test to be applied is whether in all the circumstances the gift or hospitality is reasonable and justifiable both in the UK and any other relevant country. The intention behind the gift should always be

considered. All gifts received must be submitted to Reception for inclusion in the EMEC gift register.

It is not acceptable for an employee (or someone on their behalf) to:

- give, promise to give, or offer, a payment, gift or hospitality with the expectation or hope that they or Paradigm Arts will improperly be given a business advantage, or as a reward for a business advantage already improperly given;
- give, promise to give, or offer, a payment, gift or hospitality to a government official, agent or representative to facilitate or expedite a routine procedure;
- accept payment from a Third Party where it is known or suspected that it is offered or given with the expectation that the Third Party will improperly obtain a business advantage;
- accept a gift or hospitality from a Third Party where it is known or suspected that it is offered or provided with an expectation that a business advantage will be improperly provided by Paradigm Arts in return;
- threaten or retaliate against another member of staff who has refused to commit a bribery offence or who has raised concerns under this policy; or
- engage in any activity that might lead to a breach of this policy.

Facilitation payment and 'kickbacks'
Paradigm Arts does not make, and will not accept, facilitation payments or 'kickbacks' of any kind, such as small, unofficial payments made to secure or expedite a routine government action by a government official, or payments made in return for a business favour or advantage.

Charitable donations & Sponsorship
Paradigm Arts only makes charitable donations and provides sponsorship that are legal and ethical under local laws and practices and which are in accordance with Paradigm Arts' internal policies and procedures.

Record keeping
Paradigm Arts maintains appropriate financial records and has appropriate internal controls in place which evidence the business reason for gifts, hospitality and payments made and received.

Responsibilities and raising concerns
The prevention, detection and reporting of bribery and other forms of corruption are the responsibility of all those working for Paradigm Arts or under our control. All employees are required to avoid any activity that might lead to, or suggest, a breach of this policy.

Employees are required to notify Paradigm Arts as soon as possible if it is believed or suspected that a conflict with this policy has occurred, or may occur in the future, or if they are offered a bribe, are asked to make one, suspect that this may happen in the future, or believe that they are a victim of another form of unlawful activity.

Any concerns relating to a breach of the Policy should be reported to the Company Director

Communication and review
This policy will be communicated to staff via the Handbook, during induction, and at staff meetings.

This policy will be reviewed on a biennial basis.

Signed: R Pitman
Date: 15/09/26