

EVOKEDSET LIMITED

ANTI-CORRUPTION AND BRIBERY POLICY

This policy version created: April 4th 2025

Last reviewed: April 4th 2025

Zero Tolerance

It is EvokedSet's policy to conduct all of our business in an honest and ethical manner. EvokedSet takes a zero-tolerance approach to bribery and corruption and we are committed to acting professionally, fairly and with integrity in all our business dealings and relationships wherever we operate, and to implementing and enforcing effective systems to counter bribery and corruption.

EvokedSet will uphold all laws relevant to countering bribery and corruption in all the jurisdictions in which we operate. However, we remain bound by UK laws, including the Bribery Act 2010, in respect of our conduct both at home and abroad.

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

Who must comply with this Policy?

This policy applies to all EvokedSet staff and business partners including: employees; officers; consultants; contractors; casual workers; agency workers; interns; volunteers; students; suppliers; and third parties and sub-contractors who provide services for and on behalf of EvokedSet.

What is Bribery and Corruption?

Bribery is offering, promising, giving or accepting any financial or other advantage, to induce the recipient or any other person to act improperly in the performance of their functions, or to reward them for acting improperly, or where the recipient would act improperly by accepting the advantage.

Corruption is the abuse of entrusted power or position for private gain.

What you must not do

It is not acceptable for you (or someone on your behalf) to:

- give, promise to give, or offer, a payment, gift or hospitality with the expectation or hope that a business advantage will be received, or to reward a business advantage already given
- give or accept a gift or hospitality during any commercial negotiations or tender process, if this could be perceived as intended or likely to influence the outcome

- accept a payment, gift or hospitality from a third party that you know or suspect is offered with the expectation that it will provide a business advantage for them or anyone else in return
- accept hospitality from a third party that is unduly lavish or extravagant under the circumstances or
- threaten or retaliate against another individual who has refused to commit a bribery offence or who has raised concerns under this policy.

Facilitation payments and kickbacks

EvokedSet does not make, and will not accept, facilitation payments or “kickbacks” of any kind.

Facilitation payments, also known as “back-handers” or “grease payments”, are typically small, unofficial payments made to secure or expedite a routine or necessary action (for example by a government official).

Kickbacks are typically payments made in return for a business favour or advantage.

You must avoid any activity that might lead to a facilitation payment or kickback being made or accepted by us or on our behalf, or that might suggest that such a payment will be made or accepted. If you are asked to make a payment on our behalf, you should always be mindful of what the payment is for and whether the amount requested is proportionate to the goods or services provided. You should always ask for a receipt which details the reason for the payment. If you have any suspicions, concerns or queries regarding a payment, you should raise these with the Managing Director.

Gifts and Hospitality

This policy allows reasonable and appropriate hospitality or entertainment given to or received from third parties, for the purposes of:

- establishing or maintaining good business relationships
- improving or maintaining EvokedSet’s image or reputation or
- marketing or presenting our services effectively.

Gifts must be of an appropriate type and value depending on the circumstances and taking account of the reason for the gift. Gifts must not include cash or cash equivalent (such as vouchers), or be given in secret. Gifts must be given in our name, not your name.

You must declare and keep a written record of all hospitality or gifts given or received over the value of £30 (or equivalent), which will be subject to managerial review.

Promotional gifts of low value such as branded stationery to or from existing customers, suppliers and business partners will usually be acceptable.

We appreciate that practice varies between 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, hospitality or payment is reasonable and justifiable. The intention behind it should always be considered.

Record Keeping

We must keep financial records and have appropriate internal controls in place which will evidence the business reason for making payments to third parties.

You must submit all expenses claims relating to hospitality, gifts or payments to third parties in accordance with our expenses policy and record the reason for expenditure.

How can you raise a concern?

You are encouraged to raise concerns about any issue or suspicion of bribery or corruption at the earliest possible stage.

If you are offered a bribe, or are asked to make one, or if you believe or suspect that any bribery, corruption or other breach of this policy has occurred or may occur, you must notify the Managing Director.

If you are unsure about whether a particular act constitutes bribery or corruption, raise it with the Managing Director.

Potential Risk Scenarios or “red flags”

If you encounter any of these red flags while working for us, you must report them promptly to the Managing Director.

- you become aware that a third party engages in, or has been accused of engaging in, improper business practices
- you learn that a third party has a reputation for paying bribes, or requiring that bribes are paid to them, or has a reputation for having a “special relationship” with foreign government officials
- a third party insists on receiving a commission or fee payment before committing to sign up to a contract with us, or carrying out a government function or process for us
- a third-party requests payment in cash and/or refuses to sign a formal commission or fee agreement, or to provide an invoice or receipt for a payment made
- a third-party requests that payment is made to a country or geographic location different from where the third party resides or conducts business
- a third-party requests an unexpected additional fee or commission to “facilitate” a service
- a third-party requests that a payment is made to “overlook” potential legal violations
- you receive an invoice from a third party that appears to be non-standard or customised
- you notice that we have been invoiced for a commission or fee payment that appears large given the service stated to have been provided
- a third-party requests or requires the use of an agent, intermediary, consultant, distributor or supplier that is not typically used by or known to us

- a third party demands lavish entertainment or gifts before commencing or continuing contractual negotiations or provision of services
- a third party requests that you provide employment or some other advantage to a friend or relative or
- a third party insists on the use of side letters or refuses to put terms agreed in writing.

FURTHER INFORMATION AND CONTACTS

If you have any queries about the application of this policy, please contact EvokedSet Managing Director Nicky Denovan.

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