ADVANCED ENGINEERING GROUP

POWER · MOTION · CONTROL

ANTI-BRIBERY AND CORRUPTION POLICY

Introduction

ADVANCED ENGINEERING GROUP (the "Company"), based in the United Kingdom, is committed to conducting its business with integrity, transparency, and accountability. We have zero tolerance for bribery and corruption in any form. This policy outlines our commitment to preventing bribery and corruption and sets out the responsibilities of employees, suppliers, vendors, and business partners in upholding these standards.

Scope

This policy applies to all employees, officers, directors, suppliers, vendors, contractors, consultants, and any other third parties acting on behalf of Advanced Engineering Group, regardless of their location.

Company Structure

Headquartered in SILSDEN, UK, ADVANCED ENGINEERING GROUP operates internationally through various legal entities, including:

- **ADVANCED ACTUATORS LIMITED**
- **ADVANCED COMPONENTS LIMITED**
- **ADVANCED DRIVES**

Policy Statement

Zero Tolerance for Bribery and Corruption:

ADVANCED ENGINEERING GROUP strictly prohibits the offering, giving, solicitation, or acceptance of any bribe, whether cash or other inducement, to or from any person or company, public official or private individual, regardless of whether they are located in the UK or abroad.

Compliance with Laws:

We comply with all applicable anti-bribery and corruption laws, including but not limited to the UK Bribery Act 2010 and other relevant local laws in the jurisdictions where we operate.

Prohibited Activities:

The following activities are strictly prohibited:

- Offering, promising, or giving a bribe, or anything of value, to gain a commercial, contractual, regulatory, or personal advantage.
- Requesting, agreeing to receive, or accepting a bribe, or anything of value, that results in an improper performance of one's duties.
- Engaging in any form of corrupt activity, including facilitation payments, kickbacks, or illicit donations.

Gifts and Hospitality:

Gifts and hospitality can be offered or accepted only if they are reasonable, proportionate, and for legitimate business purposes. They must not influence, or appear to influence, business decisions or give rise to a conflict of interest.

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Charitable Donations and Sponsorships:

Charitable donations and sponsorships must not be used as a subterfuge for bribery. All donations and sponsorships must be transparent, properly documented, and made in accordance with the Company's policies and procedures.

Responsibilities

Employees are required to:

- Read, understand, and comply with this policy.
- Report any suspicions or knowledge of bribery or corruption to their line manager or Director

Managers are responsible for:

- Ensuring their teams understand and comply with this policy.
- Leading by example in upholding the highest standards of integrity.
- Monitoring and ensuring adherence to the policy within their areas of responsibility.

Suppliers and business partners must comply with this policy and any relevant anti-bribery and corruption laws. They are expected to:

- Avoid any activity that might lead to, or suggest, a breach of this policy.
- Promptly report any concerns or suspicions of bribery or corruption related to their dealings with the Company.

Reporting and Whistleblowing

Employees and third parties are encouraged to report any concerns or suspicions of bribery or corruption. Reports can be made confidentially and anonymously via the Company's whistleblowing hotline or email (see employee handbook). The Company will investigate all reports promptly and thoroughly.

Consequences of Non-Compliance

Non-compliance with this policy may result in disciplinary action, including termination of employment or contract. In addition, violations may result in criminal charges, fines, and reputational damage to the Company and individuals involved.

Training and Awareness

Training Notes are attached to this Policy and should be read by all employees; anyone requiring any further guidance or external training should notify your line manager or a Director of the company

Review and Update

This policy will be reviewed annually and updated as necessary to ensure its continued relevance and effectiveness in preventing bribery and corruption.

This policy has been endorsed and approved by:

Andrew Peace
Managing Director

Date: 1st June 2026

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TRAINING NOTES

Introduction

As a UK based engineering business that exports internationally, it is crucial to uphold the highest standards of integrity and compliance with anti-bribery and corruption laws. These notes are designed to provide you with a comprehensive understanding of our ABC policy, relevant legislation, and practical guidance to prevent bribery and corruption in our operations.

Understanding Bribery and Corruption

Definitions

- **Bribery**: Offering, giving, receiving, or soliciting something of value to influence a business decision or gain an unfair advantage.
- **Corruption**: Abuse of entrusted power for private gain, which can include bribery, extortion, fraud, and other unethical practices.

Examples

- **Bribery**: Paying a government official to expedite the approval of a permit.
- **Corruption**: An employee accepting gifts from a supplier in exchange for favourable contract terms.

Relevant Legislation

UK Bribery Act 2010

- **Overview**: The UK Bribery Act 2010 is one of the strictest anti-bribery laws in the world. It criminalizes offering, promising, giving, requesting, or receiving a bribe.
- **Key Provisions**:
  - **Section 1**: Offense of bribing another person.
  - **Section 2**: Offense of being bribed.
  - **Section 6**: Bribery of foreign public officials.
  - **Section 7**: Failure of commercial organizations to prevent bribery.

Key Policy Components

Gifts and Hospitality

- **Guidelines**: Employees must not offer or accept gifts or hospitality that could influence business decisions or create a conflict of interest.
- **Approval Process**: All gifts and hospitality above a nominal value must be reported and approved by management.

Facilitation Payments

- **Definition**: Small payments made to expedite routine actions.
- **Policy**: Facilitation payments are strictly prohibited.

Third-Party Relationships

- **Due Diligence**: Conduct thorough due diligence on all third parties, including suppliers, agents, and partners, to ensure they comply with our ABC policy.
- **Contracts**: Include anti-bribery clauses in all contracts with third parties.

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Practical Guidance

Recognizing Red Flags

- **Unusual Payments**: Requests for unusually large or complex payments.
- **Lack of Transparency**: Business partners who refuse to provide clear information about their operations.
- **Excessive Gifts**: Offers of lavish gifts or hospitality.

What to Do If You Suspect Bribery or Corruption

- **Do Not Engage**: Do not participate in any suspected bribery or corruption activity.
- **Report Immediately**: Report the incident to your line manager or use the whistleblowing hotline.
- **Document**: Keep detailed records of any suspicious activity or communications.

Conclusion

Adhering to our Anti-Bribery and Corruption policy is essential to maintaining the integrity and reputation of Advanced Engineering Group. By understanding the risks and following the guidelines outlined in these notes, you play a vital role in ensuring that our business operates ethically and legally.

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