



Anti-Bribery and Corruption Policy

ANTI-BRIBERY & CORRUPTION POLICY

Approved by the Board: November 2025
Next Review Due: November 2027

1. Our commitment

The Embroidered & Printed Clothing Company operates to high ethical, professional and legal standards. We take a zero tolerance approach to bribery, corruption, or any attempt to gain an unfair business advantage. This policy applies to all employees, directors, contractors, agents, consultants, suppliers and any third party acting on our behalf, wherever we operate.

2. Legal compliance

We comply with all applicable antinbribery and anticorruption legislation, including the UK Bribery Act 2010.

Where local laws are stricter, they take precedence. Where they are weaker or silent, this policy sets the minimum standard.

3. Definition of bribery and corruption

Bribery includes offering, giving, requesting or receiving any advantage intended to improperly influence a decision or behaviour.

This includes money, gifts, hospitality, loans, services, discounts, kickbacks, facilitation payments, or benefits to family members or associates.

4. Consequences of breach

Breaches of this policy may result in disciplinary action up to and including dismissal, termination of contracts, legal penalties and reputational damage.

5. Prohibited conduct and controls

Company funds or resources must never be used for bribery or corrupt practices, directly or indirectly.

5.1 Gifts and hospitality

Gifts and hospitality must be reasonable, proportionate and transparent. Cash or cash equivalent gifts are prohibited. Approval and recording are required above set thresholds.

5.2 Third parties

All agents, intermediaries and representatives must be subject to due diligence, written contracts and ongoing monitoring. Payments must be legitimate and traceable.

5.3 Public officials

No gifts, hospitality or payments may be offered to public officials to obtain or retain business or secure an advantage.

5.4 Charitable and political contributions

We do not make political donations. Charitable donations must be approved, documented and never used to disguise improper payments.

6. Reporting concerns

All suspected or actual bribery or corruption must be reported immediately. Retaliation against whistleblowers is prohibited.

7. Risk assessment

Bribery and corruption risks are assessed periodically and controls updated as required. Departments must identify and mitigate risks relevant to their activities.

8. Training and awareness

All employees receive this policy. Targeted training is provided for higher risk roles. Refresher training is conducted periodically.

9. Registers and declarations

The company maintains registers for gifts, hospitality and charitable donations. Conflicts of interest must be declared annually or when they arise.

10. Acquisitions and transactions

Bribery risks are assessed during mergers and acquisitions. Post transaction, this policy applies immediately.

11. Policy ownership and review

This policy is owned by the Managing Director and reviewed at least every two years or sooner if required.

Signed: Justin Baker

Managing Director

Date: November 2025