

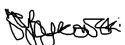


ONCILLA SECURITY LTD

Anti-Bribery, Corruption & Competition Policy

Approved by: Tina Bykowski

Job Role: Managing Director

Signed: 

Date:

This policy must be reviewed by the following date: Nov 14, 2026

Company Name:	ONCILLA SECURITY LTD
Approved By:	Tina Bykowski
Review Date:	Nov 14, 2026

General Statement of intent: Anti-Bribery, Corruption & Competition

It is the Policy of the ONCILLA SECURITY LTD to ensure that our business is conducted in accordance with competition law and the Bribery Act 2010 while operating in an ethical, professional, fair, honest, and open manner.

ONCILLA SECURITY LTD has a zero-tolerance approach to all forms of bribery and corruption which include:

- The direct or indirect promise, offering or authorisation of anything of value.
- The offer or receipt of any kickback, loan, fee, reward, or other advantage.
- The giving of aid, donations or voting designed to exert improper influence.
- Payments for lavish or inappropriate entertainment or travel.
- Favours including offers of employment.
- Facilitation payments.
- Inflated commissions.
- Fake consultancy agreements.

ONCILLA SECURITY LTD opposes all forms of bribery, corruption and anti competitive behaviour, large as well as small, whether initiated by corrupt officials or corrupt companies or individuals, and whether it takes place in the public or private sector, in the UK or abroad.

The definition of bribery for the purpose of this policy can be defined as the act of promising, giving, receiving, or agreeing to receive money or some other item of value with the corrupt aim of inducing a person to perform a relevant function or activity improperly

To adhere to the policy, we will:

- Ensure all Company personnel are provided with training on the ONCILLA SECURITY LTD Company Policy on anti-bribery and corruption so they can recognise the signs and take steps to avoid it.
- Encourage employees, subcontractors, and business partners to report any suspicions of bribery and/or corruption through formal 'whistle blowing' channels or more informally through our Company 'open door' policy which enables any individuals to discuss any concerns they may have with senior management in a confidential environment.
- Understand how bribery may occur during the ONCILLA SECURITY LTD operations and the impacts this could have, implementing appropriate control measures as necessary to prevent occurrence.
- Use appropriate disciplinary and other sanctions for violations of the policy and/or laws against bribery and corruption.
- Constantly monitor and regularly review this Anti-Bribery and Corruption Policy to ensure its continuing suitability.
- Undertake monitoring of employee expenses records to ascertain any anomalies which may fall into the scope of this Policy.
- Provide copies of this Anti-Bribery and Corruption Policy Statement to all employees.

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Failure to comply with this policy may result in disciplinary action, including dismissal or appropriate sanctions, in addition to civil and criminal charges.

We will ensure that suitable and sufficient procedures are implemented to prevent bribery in line with the 6 principles..

- Proportionality
- Top-Level Commitment
- Risk Assessment
- Due Diligence
- Communication
- Monitoring and Review

Additionally, we will ensure that we do not take part in any of the following anti-competitive behaviour:

- Joint selling or purchasing with competitors.
- Price fixing with retailers or suppliers.
- Keeping an exclusivity period in period of over 5 years.

Additionally, we will take all necessary steps to ensure that we are compliant with the requirements of the Competition and Markets Authority (CMA) and will implement best practice wherever possible.

Control of Fraud

As an organisation, we will do everything reasonably practicable to prevent fraud and malpractice within our operations. We will regularly evaluate our approach to identifying the fraud risks within our business and what our customers can potentially be exposed to. We will endeavor to

- Regularly risk assess the business and evaluate our fraud prevention procedures, improving them where possible
- Appoint competent individuals to constantly monitor the fraud control procedures within the business
- Give information, instruction and training to staff at all levels on the prevention of fraud and malpractice
- Put the needs of the customers and the business ahead of the needs of the individual
- Ensure that customers and staff at all levels can an effective and efficient means of reporting fraud (or suspected fraud) within the business
- Communicate this policy with customers and staff at all levels
- Seek external competent advice as and when required.

If you are unsure on any of our Fraud prevention procedures, then please contact a senior person within the business.

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Third Party Payments

Third-party payments may include but are not limited to political contributions, charitable donations and sponsorship. ONCILLA SECURITY LTD does not make contributions or donations to political organisations or independent candidates, nor does it incur any political expenditure. We respect the right of individual personnel to make personal contributions, provided they are not made in any way to obtain advantage in a business transaction. Any charitable donations or sponsorship are given according to Company policy and care must be taken to ensure such donations are never used to gain improper influence.

Facilitation Payments

Facilitation payments are prohibited under any and all circumstances. These are any payments, usually small cash payments made to low-level officials, as a bribe to secure or expedite the performance of a routine or necessary action or level of service. ONCILLA SECURITY LTD personnel and Business Partners should report, via the appropriate communications channel, any instance where a facilitation payment is alleged to have been paid on the Company's behalf.

- Colleagues or personnel from the Third Party are in attendance;
- The Third Party does not pay for any associated accommodation or (more than trivial) travel expenses;
- The entertainment or hospitality and/or acceptance of it could not be interpreted as a reward, inducement or encouragement for a favour or preferential treatment;
- The frequency of hospitality or entertainment invitations from a Third Party is not excessive i.e., an individual colleague should not accept hospitality or entertainment invitations from the same Third Party more than once or twice in any financial year;
- It is proportionate in the context of the business relationship.

In addition, colleagues should always consider if the Third Party's behaviour and reputation is in line with ONCILLA SECURITY LTD values, prior to accepting any invitations for hospitality or entertainment.

Travel Expenses

In certain circumstances, third parties may offer to pay for travel and / or accommodation where no hospitality or entertainment is being provided. This could arise, for example, in the context of business meetings or conferences overseas. If the travel and accommodation is necessary for the purpose of obtaining or seeking clear business benefits for ONCILLA SECURITY LTD, it is acceptable to allow a supplier or conference host to pay as long as the travel and accommodation is not lavish (e.g luxury hotels or first class travel) and there are no grounds to suggest any intention to induce or reward inappropriate conduct.

Failure to comply with this policy may result in disciplinary action, including dismissal or appropriate sanctions, in addition to civil and criminal charges. It is the responsibility of all management levels to ensure that those reporting to them understand and comply with this policy.

Anti-Competitive Behaviour

Additionally, we will ensure that we do not take part in any of the following anti-competitive behaviour:

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- Keeping an exclusivity period of over 5 years.
- Joint selling or purchasing with competitors.
- Price fixing with retailers or suppliers.

Investigation arrangements

It is our policy to investigate any and all suspicious behaviour within the business. Our policy extends to employees at all levels as well as contractors and all third party suppliers.

All investigations will be conducted confidentially to protect the rights of individuals. The investigation will follow and legal and regulatory compliance applicable to the topic. Investigations will follow a fair, legal and impartial process, ensuring that all parties involved are treated equally. Findings and outcomes will be documented and communicated as appropriate, without causing conflict to confidentiality.

Employees should report suspected breaches to the relevant reporting channel. This would usually be your direct manager who will then raise it further within the business. If you suspect a member management of suspicious behaviour, please report this to another member of the management team or compliance officer. Whistleblowers are protected under law and you will not be treated unfairly or dismissed for 'blowing the whistle'.

The investigator / compliance officer will then plan an investigation with other key parties to ensure it is suitable and sufficient. They will then move to collect sufficient evidence such as physical and electronic records, documentation and more. Where required we will seek competent assistance from a third party for assistance in the investigation.

Interviews will be conducted with the whistleblower, effected individuals and the accused party. Records of the interview will be kept on file. Temporary measures may be put in place (Such as temporary suspension from work) to ensure that no further behaviour is committed and that evidence is not compromised during the process.

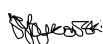
Once evidence is collated and interviews are completed, a final report will be written up detailing all of the findings from the investigation. The report will outline all of the details found and an overview of potential corrective actions, disciplinary measures and a reviews to company policies and procedures.

The senior management team, with the assistance of the compliance officer will then decide on the actions going forward and what disciplinary measures will take place (if found guilty). All actions will be done so in compliance with the law.

Sign Off & Approval

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