Ireland Alloys Ltd

Anti-Bribery and Anti-Corruption Policy

1. Policy Statement

Ireland Alloys Ltd is committed to conducting all its business activities with the highest standards of honesty, integrity, and transparency.
We take a **zero-tolerance approach** to bribery and corruption in any form.

We comply fully with the **Bribery Act 2010**, which applies in Scotland, and all other relevant Scottish and UK laws.
All employees, officers, contractors, suppliers, and business partners are expected to act professionally and ethically in all business dealings and relationships.

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2. Purpose

This policy aims to:

- Set out our responsibilities and the responsibilities of those working for or with us, in observing and upholding our position on bribery and corruption.
- Provide information and guidance on how to recognise and deal with bribery and corruption issues.
- Protect Ireland Alloys Ltd, our employees, and stakeholders from legal and reputational risks.

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3. Scope

This policy applies to:

- All persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners.
- All operations within Scotland, the wider UK, and any international dealings conducted on behalf of the company.

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4. Legal Framework

This policy is based on and complies with the **UK Bribery Act 2010**, which applies across Scotland and the rest of the UK.
Under the Act, it is a criminal offence to:

1. Offer, promise, or give a bribe.
2. Request, agree to receive, or accept a bribe.
3. Bribe a foreign public official.
4. Fail to prevent bribery by persons associated with a company.

Breaches can result in unlimited fines for the company and imprisonment for individuals.

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5. Definitions

Bribery is the offering, promising, giving, requesting, or accepting of any financial or other advantage to induce or reward improper performance of a person's duties.

Corruption is the abuse of entrusted power for personal gain or advantage. Corruption can also take place where the offer or payment is made by or through a third party.

Examples include:

- Payments to a company's employee or their connected persons, or those of a third party, to secure advantage in business transactions.
- Political contributions made to secure advantage in business transactions.
- Charitable sponsorships used to secure advantage in business transactions.
- Facilitation payments or other kickbacks made to secure or accelerate routine or necessary business transactions.
- Gifts, hospitality and expenses payments made to secure advantage in business transactions.
- Provisions of favours to public officials other than through normal business conduct procedures.
- Uncompensated use of company services, facilities or property.
- Provision of training ad associated travel, accommodation and living costs to public officials.

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6. Our Commitments

Ireland Alloys Ltd will:

- Not tolerate, permit, or engage in bribery or corruption in any form.
- Implement and maintain effective anti-bribery controls.

- Train employees to identify and prevent bribery.
- Conduct due diligence on third parties to ensure ethical business practices.
- Maintain accurate financial records and transparent accounting.
- Report and investigate all suspected breaches.

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7. Gifts, Hospitality, and Donations

- Normal and proportionate hospitality intended to improve working relationships or promote the company's services is acceptable **only** if it is reasonable, transparent, and not intended to influence a decision.
- Gifts must be of **low value**, infrequent, and approved by a line manager or director.
- Cash gifts are strictly prohibited.
- Charitable donations or sponsorships must never be used as a cover for bribery or influence.
- Political donations by the company are prohibited.

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8. Facilitation Payments

Ireland Alloys Ltd **does not permit facilitation payments** (small, unofficial payments made to secure or expedite routine actions).
If an employee is asked to make such a payment, they must refuse and report the incident to management immediately.

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9. Responsibilities

Management is responsible for:

- Promoting a culture of integrity and compliance.
- Ensuring staff understand and adhere to this policy.
- Monitoring and enforcing anti-bribery controls.

Employees and representatives must:

- Read, understand, and comply with this policy.
- Avoid any activity that could lead to a breach.
- Report any suspicion or actual instance of bribery or corruption immediately.

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10. Reporting Concerns

Any employee or third party may report suspected bribery or corruption through:

- Their line manager or supervisor.
- The Managing Director; or Confidential reporting channels established by the company.

Reports will be handled discreetly and investigated thoroughly. No employee will suffer any detriment for refusing to engage in bribery or for raising a genuine concern in good faith.

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11. Record-Keeping

- All accounts, invoices, and related documents must be accurately recorded and maintained with appropriate detail.
- No "off book" accounts will be permitted.
- Expenses related to gifts, hospitality, or donations must be properly authorised and recorded.

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12. Training and Communication

- Anti-bribery and corruption training will be provided to all relevant employees.
- The policy will be communicated to suppliers, agents, and business partners to ensure shared understanding.
- Regular refresher sessions will be held as necessary.

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13. Breaches of Policy

Any employee found to have breached this policy will face disciplinary action, which may include dismissal for gross misconduct.
The company may terminate relationships with other individuals or organisations working on its behalf if they are found to have engaged in bribery or corruption.

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14. Monitoring and Review

The **Board of Directors** is responsible for monitoring the effectiveness of this policy and reviewing it annually to ensure continued compliance with Scottish and UK law and best practice standards.

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15. Approval

This policy was approved by the **Board of Directors** of Ireland Alloys Ltd on **1 July 2026** and will be reviewed annually.

Signed:

Stuart Douglas
Managing Director
Ireland Alloys Ltd
1.7.26