

POL05 ANTI-BRIBERY & ANTI-CORRUPTION POLICY

1 INTRODUCTION

1.1 PURPOSE

The System Engineering Group Code of Conduct states that we do not offer or accept any improper benefits to obtain or retain unjustified commercial advantages. This Policy sets forth in more detail our respective principles and rules.

1.2 SCOPE AND APPLICABILITY

This Policy applies to all directors, managers, and employees) of Hardtech HV Ltd and its affiliates.

This Policy is aligned with applicable laws and industry codes. In some countries, local laws and regulations may be more stringent than the principles set out in this Policy. Where this is the case, the more stringent rules apply.

2 PRINCIPLES AND RULES

2.1 BASIC RULES

Bribery means offering, giving or receiving an improper benefit with the intention of influencing the behaviour of someone to obtain or retain an unjustified commercial advantage.

Bribery can take a variety of forms - offering, giving, or receiving money or anything else of value.

Our people must not offer, give, or receive bribes and they must not use intermediaries, such as agents, consultants, advisers, distributors, or any other business partners to commit acts of bribery.

Hardtech HV Ltd does not distinguish between public officials and private persons so far as bribery is concerned: bribery is not tolerated, regardless of the status of the recipient.

Always ask yourself before offering, giving or accepting money or anything else of value if such action could be viewed as having an illegitimate purpose. If the answer is yes, you must not proceed.

If you are in any doubt, consult your manager or senior management.

2.2 GIFTS, HOSPITALITY, AND ENTERTAINMENT

Gifts are benefits of any kind given to someone as a sign of appreciation or friendship without expectation of receiving anything in return. They include

'courtesy gifts', which are small gifts given at culturally recognized occasions (e.g. weddings, funerals) or special times of the year (e.g. Christmas, New Year). Hospitality generally includes refreshments, meals, and accommodation. Entertainment generally includes attendance at plays, concerts, and sports events.

Gifts, hospitality, and entertainment must be modest, reasonable and infrequent so far as any individual recipient is concerned.

They must never be offered, provided or accepted with the intent to cause an unjustified favour or to avoid a justified disadvantage.

Cash and gifts that are cash equivalent must never be given.

Before giving, providing or accepting a gift, hospitality or entertainment, consider whether the reputation of Hardtech HV Ltd, yourself, or the recipient is likely to be damaged if news of the gift, hospitality, or entertainment appeared on the front page of a newspaper. If this would embarrass either the company, you or the recipient, do not proceed.

2.3 GRANTS AND DONATIONS

Grants and donations are benefits given by the company in the form of money or in-kind contributions (e.g. the donation of equipment to educational establishments). They can also involve both a monetary payment and an in-kind contribution.

Hardtech HV Ltd provides grants and makes donations for a variety of legitimate purposes, particularly to charitable projects and for humanitarian needs (e.g. after earthquakes, tsunamis, or floods).

Requests for grants or donations must be handled with special caution, in particular, those requests received from individuals who are able to affect the business of Hardtech HV Ltd or may benefit personally, if the request is granted.

2.4 SPECIAL RULES RELATING TO PUBLIC OFFICIALS

The term 'public official' has been extensively interpreted by regulators to include employees and officers of government departments, employees and officers of companies owned or partially owned by a government, officers and employees of international organizations, such as the United Nations, politicians, candidates of political parties etc.

Hardtech HV Ltd does not distinguish between public officials and employees of private sector organizations so far as bribery is concerned. However, it is important to know that public officials are often subject to stricter rules and restrictions than persons who operate in the private sector. We do not make

facilitation payments to public officials and political parties. We do give gifts of any kind to public figures and politicians.

Any relationship with public officials must be in strict compliance with the rules and regulations to which they are subject (i.e. any applicable rules or regulations in the particular country relating to public officials or that have been imposed by their employer) and any benefit conveyed to a public official must be fully transparent, properly documented, and accounted for.

2.5 FACILITATION PAYMENTS

Facilitation payments are payments to public officials to expedite the performance of duties of a non-discretionary nature. These payments are intended to influence only the timing of the public officials' actions (e.g. payments to expedite visa issue or clearing goods through customs), but not their outcome.

Hardtech HV Ltd actively prohibits facilitation payments. This applies even if local law or custom do not explicitly penalize such payments.

2.6 THIRD PARTIES

A Third Party is any person, including a legal entity, with whom the company interacts and that is not a Hardtech HV Ltd company or Associate.

Hardtech HV Ltd must only engage with Third Parties if there is a legitimate need for the services or the goods that they provide; if the services and goods are priced at no more than market value; if there is a written contract; and if the receipt of such services or goods is properly documented.

Engagement of Third Parties must never be used to create or secure any improper business advantage for Hardtech HV Ltd.

2.7 BOOKS AND RECORDS/INTERNAL CONTROLS

Books and records include accounts, invoices, correspondence, papers, CDs, tapes, memoranda and any other document or transcribed information of any type.

Hardtech HV Ltd must prepare and maintain books and records that accurately and in reasonable detail document the source of the revenues and the use that has been made of company assets.

'Off-the-books' accounts and false or deceptive entries in the Hardtech HV Ltd books and records are strictly prohibited. All financial transactions must be documented, regularly reviewed and properly accounted for in the books and records of the relevant entity.

All relevant financial controls and approval procedures must be followed.

3. IMPLEMENTATION

3.1 TRAINING

Associates must familiarize themselves with this Policy and participate in anti-bribery training when offered.

3.2 REPORTING OF POTENTIAL MISCONDUCT

Any Associate who learns of a potential violation of applicable laws or this Policy is required to report his or her suspicion promptly to the responsible local manager or senior management.

3.3 BREACH OF THIS POLICY

Breaches of this Policy will not be tolerated and can lead to disciplinary and other actions up to and including termination of employment.

3.4 ENTRY INTO FORCE AND IMPLEMENTATION

It is effective and published to SharePoint on 30th January 2024. Policy statements in our management system with legal requirements are reviewed annually by the signing director. *This policy statement can be found on our website at www.hardtech-hv.com

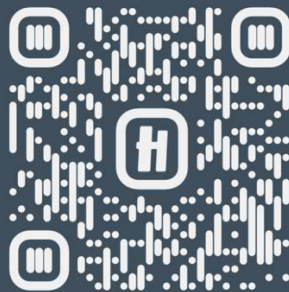
Signed by:



Phil McClennon
Director
Hardtech H.V. Limited

6th January 2025

Trust the
outcome™



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