Anti-Bribery & Corruption Policy

1. Our Commitment

Subcontext has zero tolerance for bribery and corruption. We comply with the Bribery Act 2010, and expect the same of everyone who works for or with us.

We win and keep business on the quality of our platform and service. Our customers are regulated firms, and they need to be able to rely on the integrity of their suppliers. Under section 7 of the Bribery Act 2010, a company can commit an offence if someone acting for it pays a bribe and it has not put adequate procedures in place to prevent that. This policy sets out those procedures in a way that is proportionate to a small company.

2. Scope

This policy applies to all directors, employees, contractors, and anyone acting on Subcontext's behalf.

It covers dealings with customers, prospective customers, suppliers, partners, public officials and regulators, in the UK and anywhere else, and applies whether a benefit is offered directly or through someone else.

3. Definitions

Term	Meaning
Bribe	Any financial or other advantage offered, promised, given, requested or accepted to induce or reward someone for performing a function improperly
Public official	Anyone holding a legislative, administrative or judicial position, or working for a government, public body or public international organisation, in any country
Facilitation payment	A small, unofficial payment made to speed up or secure a routine action by an official
Gifts and hospitality	Anything of value given or received, including presents, meals, entertainment, travel, tickets and accommodation

4. What Is Prohibited

- Offering, promising or giving a bribe
- Requesting, agreeing to receive or accepting a bribe
- Bribing a public official
- Facilitation payments, however small
- Using a third party to do any of these on our behalf

The only exception to the ban on facilitation payments is where someone faces a genuine threat to their life, safety or liberty. In that case they may pay, and must report it to a director as soon as they are safe so it can be recorded.

Subcontext does not make political donations.

5. Gifts and Hospitality

- Gifts and hospitality must be reasonable, proportionate and given openly, never to influence a decision
- Anything worth more than £100 must be approved by a director in advance and recorded in the gifts and hospitality register
- Cash and cash equivalents are never given or accepted
- Nothing is given or accepted while a tender or contract decision with that party is pending

When deciding whether a gift or hospitality is acceptable, ask:

1. Is its purpose to build a genuine business relationship, rather than to influence a decision?
2. Is its value reasonable for the occasion and the people involved?
3. Would I be comfortable if it were reported to our customers or published?
4. Is anything pending with this party, such as a tender, renewal or contract decision?
5. Does the recipient's employer allow it? Many regulated firms have their own limits, which we respect.

If the answer to any question raises doubt, ask a director before going ahead. Gifts or hospitality worth more than £100 that are offered without warning are politely declined or, where declining would cause offence, accepted on Subcontext's behalf and reported to a director straight away.

Worked examples

Situation	What to do
A customer's team invites you for a working lunch	Acceptable, if reasonable in value and nothing is pending with that customer
A supplier bidding for our business offers concert tickets worth £250	Decline: the value is over £100 and a decision is pending
A prospective customer's buyer asks for a "personal fee" to favour our bid	Refuse, and report it to a director immediately
You want to give a long-standing customer contact a gift voucher	Not allowed: vouchers are a cash equivalent

6. Third Parties

Agents, resellers and other partners who act for us are chosen with care, told about this policy, and bound by contract to comply with it.

Before appointing a third party to act for us, a director checks who they are, why they are needed and whether their fees are reasonable for the work. Fees are paid only against a written agreement and to an account in the third party's own name. Warning signs, such as requests for unusual payment routes,

unexplained fees or reluctance to agree to this policy, are investigated before going ahead. Suppliers are also assessed under our Supplier Risk Management Policy.

7. Records

Accurate records are kept of all payments, gifts, hospitality and expenses.

Expenses are supported by receipts. The gifts and hospitality register records what was given or received, by and to whom, its estimated value, the date and who approved it. No account is kept "off the books".

8. Roles and Responsibilities

Who	Responsibilities
Directors	Own this policy, approve gifts and hospitality over £100, keep the register, assess bribery risk, and investigate concerns
Everyone covered by this policy	Reads and follows the policy, asks before acting when unsure, and reports concerns

9. Raising Concerns

Anyone who suspects bribery or corruption should report it to a director, or under the Whistleblowing Policy. Nobody will suffer for raising a genuine concern, or for refusing to pay or accept a bribe.

This applies even if refusing means Subcontext loses business.

10. Training and Communication

Everyone covered by this policy is told about it when they join, and reminded of it at least annually. Third parties who act for us are told about it before they start.

11. Monitoring and Review

The directors review the gifts and hospitality register, and any concerns raised, at least annually, and reassess the bribery risks the business faces when we enter new markets or use new kinds of partner.

12. Consequences

Breaching this policy may lead to disciplinary action, including dismissal, and to the termination of contracts with third parties. Bribery is also a criminal offence, and individuals can face imprisonment and unlimited fines. Where appropriate, we will report suspected offences to the relevant authorities.

13. Related Documents

- Whistleblowing Policy
- Conflicts of Interest Policy
- Supplier Risk Management Policy

14. Document Control

Item	Detail
Owner	A director of Subcontext Ltd
Approved by	The directors
Review	At least annually
Effective	October 2026

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