

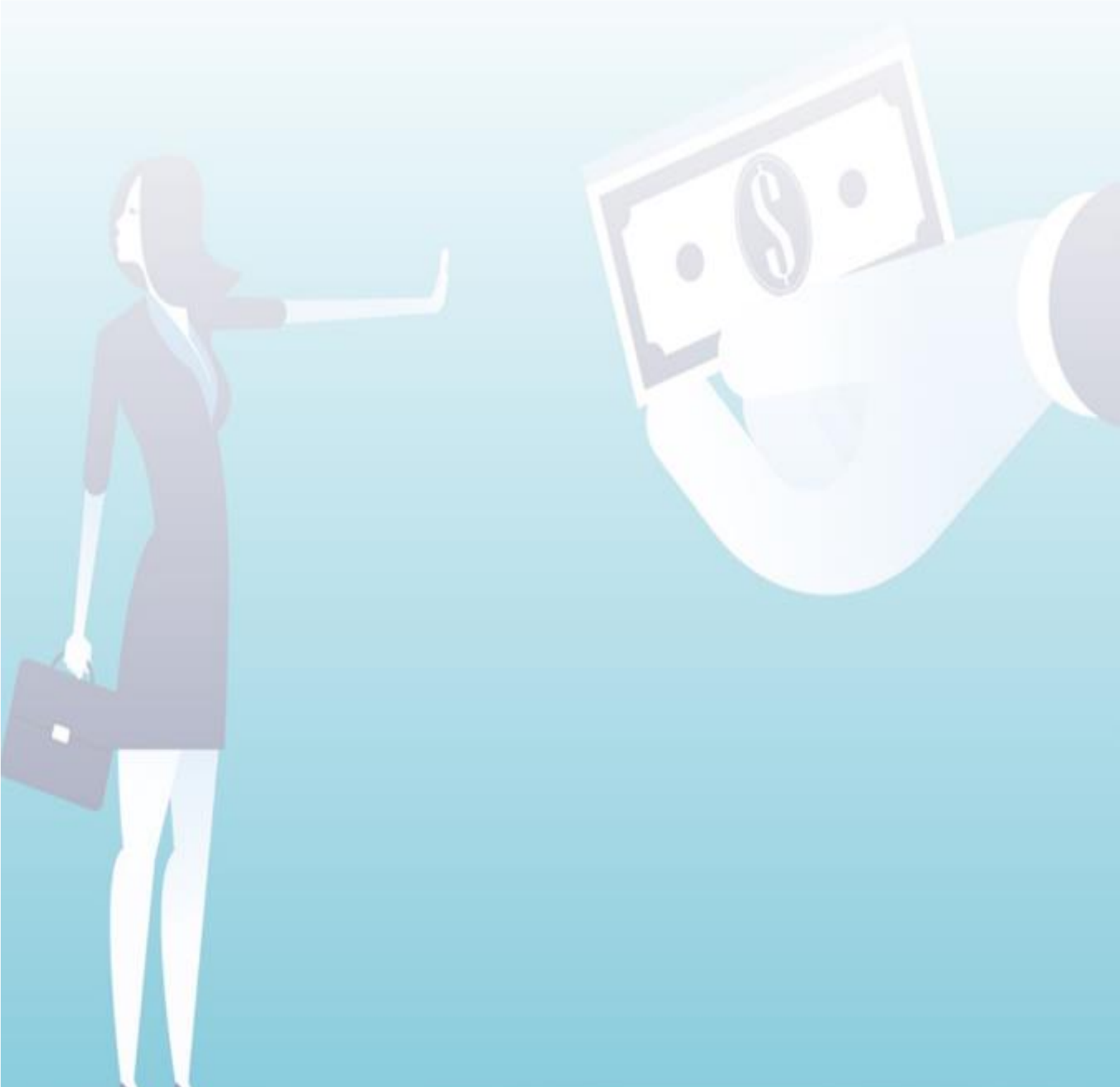


Anti-Bribery Policy

It is policy of Sprint Logistics to conduct business in an honest and ethical manner. As part of that, the company takes zero-tolerance approach to bribery and corruption and is committed to acting professionally, fairly and with integrity in all its business dealings and relationships, wherever it operates. We as a business, are also keen on implementing and enforcing effective systems to counter bribery.

Sprint Logistics will uphold all laws relevant to countering bribery and corruption in all jurisdictions in which it conducts business, including in the UK, the Bribery Act 2010 (the **Act**), which applies to conduct both in the UK and abroad.

Aizad Hussain (CEO)



Introduction

The Company is committed to the highest standards of ethical conduct and integrity in its business activities.



This policy outlines the Company's position on preventing and prohibiting bribery, following the Bribery Act 2010. The Company will not tolerate any form of bribery by, or of, its employees, agents or consultants, or any person or body acting on its behalf. The Company is committed to implementing effective measures to prevent, monitor, and eliminate bribery.

The Scope



This policy applies to all employees of the Company, and temporary workers, consultants, contractors, agents, and subsidiaries acting for, or on behalf of, the Company ("associated persons"). Every employee and associated person

acting for, or on behalf of, the Company is responsible for maintaining the highest standards of business conduct. Any breach of this policy is likely to constitute a serious disciplinary, contractual, and criminal matter for the individual concerned and may cause serious damage to the reputation and standing of the Company.

The Company may also face criminal liability for unlawful actions taken by its employees or associated persons under the Bribery Act 2010. All employees and associated persons are required to familiarise themselves and comply with this policy, including any future updates that may be issued from time to time by the Company.

Principle

The Company is committed to complying with the Bribery Act 2010 in its business activities as follows:

- ☑ The Company will carry out its business fairly, honestly, and openly showing transparent payment terms and clear records.
- ☑ The Company will not take bribes, nor will the Company condone the offering of bribes on its behalf, to gain a business advantage.
- ☑ The Company will not accept bribes, nor will agree to them being accepted on its behalf to influence business.
- ☑ The Company will avoid doing business with others who do not accept its values and who may harm its reputation.
- ☑ The Company will keep clear and updated records of all corporate hospitality, entertainment or gifts accepted or offered.
- ☑ The Company will make sure that everyone in its business and their business partners know its principles.
- ☑ The company will regularly review and update its program and process as required.



A Criminal offence will be committed under the Bribery Act 2010 if:

- ✓ An employee or associated person acting for, or on behalf of, the company offers, promises, gives requests, receives, or agrees to receive bribes.
- ✓ An employee or associated person acting for, or on behalf of Sprint Logistics offers, promises, or gives a bribe to a public official with the intention of influencing that official in the performance of their duties.
- ✓ The company does not have the defense that it has adequate procedures in place to prevent bribery by its employees or associated persons.

What is prohibited?

The company prohibits employees or associated person from offering, promising, giving, soliciting or accepting any bribe. The bribe might be cash, a gift or other inducement to, or from, any person or company. This could be from public, government official, official of state-controlled industry, political party or a private person of a state-controlled industry, political party or a private person or company, regardless of whether the employee or associated person is situated in the UK or overseas.

The bribe might be made to ensure that a person or company improperly performs duties functions (for example, by not acting impartially or in good faith or in accordance with their position of trust). This would be to gain any commercial, contractual or regulatory advantage for the company in either obtaining or maintaining company business, or to gain personal advantage, financially or otherwise.



The Prohibition also applies to indirect contribution, payments or gifts made in any manner as an inducement or reward for improper performance, for example through consultant, contractors or sub-contractors, agents or sub-agents, sponsors or sub-sponsors joint-venture partners, advisors, customers, suppliers, or other third -parties.



Corporate entertainment, gifts, hospitality, and promotional expenditure

Principle

The Company is committed to not giving or receiving bribes. As gifts and entertainment could sometimes disguise bribes, or be misinterpreted as bribes, the Company has set out the following rules which clearly define what they consider to be genuine and acceptable and what is not.

Gifts

The Company may accept gifts of small items of the limited value of £50.00. The Company may not accept valuable items i.e. gold jewelry, expensive watches, or airline tickets.

Although the Company may accept a gift now and then, they may not accept gifts that are given regularly or often.

The Company rule is that gifts they give must be of moderate value, legal under local law, and agreed by management.

Valuable items received as gifts will be returned or disposed of as agreed by management.

Entertainment

The Company may give and accept reasonable, hosted entertainment that is in the legitimate interests of the business.

The Company will not give or accept lavish or frequent entertainment, or entertainment.

Action by the company

The Company will fully investigate any instances of alleged or suspected bribery. Employees suspected of bribery may be suspended from their duties while the investigation is being carried out. The Company will invoke its disciplinary procedures where an employee is suspected of bribery, and proven allegations may result in a finding of gross misconduct and immediate dismissal. The Company may terminate the contracts of any associated persons, including consultants or other workers who act for, or on behalf of, the Company who are found to have breached this policy.

The Company may also report any matter to the relevant authorities.



Find out how our logistics solutions can support your business, call us on +44 (0) 208 751 1111 or email sales@sprintlogistics.com