

# Anti-Bribery and Corruption Policy



**Effective Date:** 3rd of January 2024

**Reviewed Date:** 3rd of January 2026

**Version:** 1.2

## 1. Purpose

Mars Power Limited is committed to conducting its business in an honest and ethical manner. We have zero tolerance for bribery and corruption in any form. This policy outlines our commitment to preventing bribery and corruption, ensuring compliance with relevant laws and regulations, and maintaining the highest standards of integrity in all our operations.

## 2. Scope

This policy applies to all employees, officers, directors, contractors, consultants, agents, intermediaries, and any other third parties acting on behalf of Mars Power Limited, regardless of location. It covers all business dealings, both domestic and international, and applies to interactions with public officials, private individuals, and companies.

## 3. Legal Compliance

Mars Power Limited is committed to complying with all applicable anti-bribery and corruption laws, including but not limited to the UK Bribery Act 2010 and the US Foreign Corrupt Practices Act (FCPA). We will:

- Ensure that all employees and associated persons are aware of and comply with the relevant legal requirements.
- Implement measures to detect, prevent, and report bribery and corruption in our business activities.

## 4. Key Principles

### 4.1. Prohibition of Bribery and Corruption

- Mars Power Limited prohibits the offering, giving, receiving, or soliciting of any form of bribe, whether directly or indirectly, to or from any individual, company, or public official, in order to obtain or retain business or secure an improper advantage.
- Bribes can include cash, gifts, hospitality, expenses, or any other benefit or favor that could influence the decision-making process of the recipient.

### 4.2. Gifts and Hospitality

- Gifts and hospitality should only be offered or accepted where they are reasonable, proportionate, and for a legitimate business purpose. They must never influence or appear to influence business decisions.

- Any gifts or hospitality exceeding a specified value (as defined in the company's internal guidelines) must be reported and approved by senior management.
- Extravagant or inappropriate gifts and hospitality are strictly prohibited.

#### **4.3. Facilitation Payments**

- Mars Power Limited does not permit facilitation payments, which are small payments made to expedite routine government actions. All employees and associated persons must avoid making or accepting such payments, regardless of local customs or practices.

#### **4.4. Political and Charitable Contributions**

- Mars Power Limited does not make political donations. Charitable contributions must be legal, ethical, and not made to secure any business advantage.
- All charitable donations must be transparent and properly recorded, with approval from senior management.

#### **4.5. Third Parties**

- Mars Power Limited expects all third parties acting on its behalf to comply with this policy. We will conduct appropriate due diligence on third parties to ensure they adhere to anti-bribery and corruption standards.
- All contracts with third parties should include clauses requiring compliance with this policy and the right to audit their activities.

#### **4.6. Reporting and Whistleblowing**

- Employees and associated persons are encouraged to report any concerns or suspicions of bribery or corruption. Mars Power Limited provides a confidential whistleblowing mechanism for reporting such issues without fear of retaliation.
- All reports will be taken seriously, investigated promptly, and addressed appropriately.

#### **5. Roles and Responsibilities**

- **Employees:** All employees are responsible for understanding and complying with this policy. They must complete any required training and report any suspected bribery or corruption.
- **Management:** Managers are responsible for ensuring that their teams understand and adhere to this policy. They must foster a culture of integrity and lead by example.
- **Compliance Officer:** The Compliance Officer is responsible for overseeing the implementation of this policy, conducting regular risk assessments, and ensuring that appropriate training is provided. The Compliance Officer will also investigate any reported breaches of this policy.

#### **6. Training and Communication**

Mars Power Limited will provide regular training on anti-bribery and corruption to all employees and associated persons. The policy will be communicated to all new employees during their induction and made available on the company intranet.

#### **7. Record-Keeping**

Mars Power Limited will maintain accurate and complete records of all transactions, including any gifts, hospitality, charitable donations, or payments made to third parties. These records will be regularly reviewed to ensure compliance with this policy.

#### **8. Breach of Policy**

Any employee or associated person found to be in breach of this policy will face disciplinary action, which may include termination of employment or contract. Mars Power Limited may also report the matter to relevant authorities where appropriate.

#### **9. Policy Review**

This policy will be reviewed annually or when there are significant changes in legislation or business operations. Updates will be communicated to all relevant parties.

#### **10. Approval**

This policy has been approved by the Board of Directors of Mars Power Limited and is effective as of the date above.



Paul Blazi  
Managing Director  
On behalf of Mars Power Limited t/a Mars Power Group