



UNIVERSAL FABRICATION (COVENTRY) LTD ANTI BRIBERY POLICY

1. Introduction

Universal Fabrications (the "Company") is committed to conducting its business with honesty, integrity, and in compliance with all applicable laws and regulations. Bribery and corruption undermine these principles and are detrimental to the Company's and Customer's reputation, values, and business interests. This Anti-Bribery Policy outlines the Company's zero-tolerance approach towards bribery and corruption in all its forms and applies to all employees, officers, directors, contractors, consultants, and any other parties associated with the Company.

2. Policy Statement

Universal Fabrications prohibits the offering, giving, solicitation, or acceptance of any bribe, whether in cash or in any other form, to or from any person or company, including government officials, private sector counterparts, or any other individual or entity, in order to gain any commercial, contractual, regulatory, or personal advantage.

3. Compliance with Laws and Regulations

All employees and associates of Universal Fabrications must comply with all applicable anti-bribery and corruption laws and regulations, including but not limited to the Foreign Corrupt Practices Act (FCPA) in the United States, the UK Bribery Act, and other relevant legislation in countries where the Company operates.

4. Prohibited Activities

- a. Offering, promising, giving, accepting, or authorizing the giving of anything of value, directly or indirectly, to any person or entity to improperly influence their actions or decisions.
- b. Engaging in any form of corrupt behaviour, including bribery, kickbacks, facilitation payments, or other improper inducements.
- c. Making or receiving payments or gifts that could be construed as bribes, regardless of the value or form.
- d. Failing to accurately record financial transactions or deliberately providing misleading information to conceal bribery or corruption.

5. Gifts, Hospitality, and Entertainment

While the Company recognizes that the exchange of gifts, hospitality, and entertainment is a common business practice, it must be done transparently and in compliance with applicable laws and regulations. All such exchanges must be reasonable, proportionate, and properly documented, and should never be offered or accepted with the intention of improperly influencing business decisions.



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6. Reporting and Whistleblowing

Universal Fabrications encourages all employees and associates to report any concerns or suspicions of bribery or corruption promptly and without fear of retaliation. Reports can be made to a supervisor, the Compliance Officer, Human Resources, or through the Company's confidential reporting mechanisms.

7. Training and Awareness

The Company is committed to providing regular training and awareness programs to ensure that all employees and associates understand their responsibilities under this policy and are equipped to recognize and address situations involving bribery and corruption.

8. Consequences of Non-Compliance

Any employee or associate found to have violated this Anti-Bribery Policy will be subject to disciplinary action, up to and including termination of employment or contractual relationship. In addition to internal sanctions, individuals may also face civil or criminal prosecution under applicable laws.

9. Review and Revision

This Anti-Bribery Policy will be reviewed periodically to ensure its effectiveness and relevance to the Company's and Customer's operations. This includes the ongoing identification of risk and mitigating and preventative actions. Any updates or revisions will be communicated to all employees and associates in a timely manner.

10. Conclusion

Universal Fabrications is committed to maintaining the highest standards of ethical conduct in all aspects of its business operations. By adhering to this Anti-Bribery Policy and upholding the principles of integrity and transparency, we can safeguard our reputation, build trust with our stakeholders, and contribute to a fair and competitive business environment.

Authorised By Managing Director: Carl Smith

Date: 15/01/2024