

Anti-Bribery Policy

Zero tolerance of bribery and corruption across OMEGA's operations and business relationships.

Company	OMEGA Solutions (Cross Hills) Limited
Document owner	Managing Director
Version	1.1
Review cycle	At least annually and following material legal or operational change

1. Purpose and commitment

OMEGA Solutions (Cross Hills) Limited (OMEGA) conducts business honestly, fairly and transparently. Bribery and corruption are prohibited in every part of our business and in every country in which we operate. OMEGA will comply with the Bribery Act 2010 and other applicable anti-bribery and anti-corruption laws.

2. Scope

This policy applies to directors, employees, workers, consultants, agents, contractors and any other person or organisation performing services for or on behalf of OMEGA (associated persons).

3. Prohibited conduct

No person covered by this policy may directly or indirectly:

- **offer, promise or give** a financial or other advantage intending to induce or reward improper conduct;
- **request, agree to receive or accept** a financial or other advantage in return for improper conduct;
- bribe a **foreign public official** to obtain or retain business or a business advantage;
- use an associated person, intermediary or third party to do anything that would breach this policy; or
- make or authorise a facilitation payment. If a payment is demanded because a person reasonably believes that they or another person face an immediate threat to health or safety, safety comes first; the payment must then be reported promptly and recorded accurately.

4. Gifts, hospitality and expenses

Reasonable and proportionate hospitality or promotional expenditure may be legitimate where it has a genuine business purpose. It must never be intended to influence a decision improperly or create an obligation. Cash and cash equivalents are prohibited. Gifts or hospitality must be modest, infrequent, legal, transparent and approved in accordance with OMEGA procedures. Anything offered to or received from a public official requires particular caution and prior Managing Director approval.

5. Donations, sponsorship and conflicts

OMEGA does not make political donations. Charitable donations and sponsorship must be lawful, transparent, approved and not used as a substitute for a bribe. Actual or potential conflicts of interest must be declared promptly.

6. Third parties and due diligence

OMEGA will apply proportionate, risk-based checks before appointing higher-risk agents, consultants, contractors or suppliers. Contractual terms, payment arrangements and the business rationale must be clear. Payments must be made only for legitimate services and to an appropriate account.

7. Records, training and reporting

All transactions, expenses, gifts and hospitality must be recorded completely and accurately. False or misleading records are prohibited. Relevant personnel will receive anti-bribery information at induction and refresher training proportionate to their role and risk exposure.

Concerns, requests for improper payments or suspected breaches must be reported promptly to the Managing Director or through any available whistleblowing route. Reports will be handled sensitively and retaliation against a person raising a genuine concern is prohibited.

8. Breaches and review

Breaches may result in disciplinary action, termination of a business relationship and referral to the appropriate authorities. The Managing Director is responsible for implementation and will review the effectiveness of this policy and related controls at least annually.

Approval

Approved by	Brian Churchyard, Managing Director
Signature	<u>Brian Churchyard</u>
Date approved	<u>17th September 2026</u>