



Anti Bribery and Corruption Policy

1. Introduction

Direct Save Telecom is committed to conducting its business with the highest ethical standards and in compliance with all applicable laws and regulations, including anti-bribery laws. This Anti-Bribery Policy outlines our commitment to preventing bribery and corruption in all aspects of our operations.

2. Prohibited Conduct

Direct Save Telecom strictly prohibits any form of bribery, whether direct or indirect, involving our employees, agents, customers, or any other individuals or organizations acting on our behalf. This includes offering, giving, receiving, or soliciting bribes, kickbacks, or any improper advantages to or from any person or entity.

3. Compliance with Laws

We will comply with all applicable anti-bribery laws, including but not limited to the UK Bribery Act 2010. This includes not engaging in bribery in the UK or abroad, as well as not tolerating bribery by any third parties acting on our behalf.

4. Gifts, Hospitality, and Expenses

Gifts, hospitality, and expenses may be offered or received in the course of business relationships. However, they must be reasonable, proportionate, and in compliance with applicable laws and regulations. Any gifts or hospitality offered or received must not be intended to influence business decisions or create an obligation. Any gift over £40.00 must be recorded in the gift register.

5. Due Diligence

We will exercise due diligence in selecting and monitoring our business partners, including suppliers, agents, distributors, and consultants. We will assess their integrity, reputation, and compliance with anti-bribery laws before entering into any business relationship.

6. Reporting and Whistleblowing

Direct Save Telecom encourages all employees and stakeholders to report any suspected or actual instances of bribery or corruption promptly. We have established reporting

mechanisms, such as a confidential whistleblowing hotline or email, to ensure that individuals can report concerns without fear of retaliation.

7. Training and Awareness

We will provide regular training and awareness programs to our employees and relevant stakeholders to ensure they understand their responsibilities under this Anti-Bribery Policy. This includes educating them on the risks associated with bribery and corruption and providing guidance on how to identify and prevent such activities.

8. Consequences of Non-Compliance

Any employee found to be in violation of this Anti-Bribery Policy may face disciplinary action, up to and including termination of employment. Additionally, individuals or entities acting on behalf of Direct Save Telecom found to be involved in bribery or corruption may face legal consequences, including civil and criminal penalties.

9. Policy Review

This Anti-Bribery Policy will be reviewed periodically to ensure its effectiveness and compliance with changing laws and regulations. Any necessary updates or revisions will be made accordingly.

By adhering to this Anti-Bribery Policy, Direct Save Telecom demonstrates its commitment to maintaining the highest standards of integrity and ethical conduct in all business activities.