

Anti-Bribery and Corruption Policy

Purpose:

This policy sets out Net Gain Solutions' commitment to preventing bribery and corruption in all its business dealings, ensuring compliance with the UK Bribery Act 2010.

Scope:

This policy applies to all employees, subcontractors, and suppliers engaged in any capacity with any entity within the Net Gain Solutions group.

Policy Statement:

The Net Gain Solutions group operates with the highest ethical standards and has zero tolerance for bribery and corruption. We are committed to transparency and integrity in all business relationships.

1. Prohibited Activities:

- **Bribery:** Offering, promising, giving, or accepting any financial or other advantage to influence a business decision or gain an improper advantage.
- **Facilitation Payments:** Small, unofficial payments to expedite routine government actions are strictly prohibited.
- **Gifts and Hospitality:** Accepting or offering gifts or hospitality must be reasonable, proportionate, and not intended to influence business decisions.

2. Risk Management and Due Diligence:

- Conduct risk assessments of business operations to identify and mitigate bribery risks.
- Perform due diligence on suppliers, subcontractors, and third parties to ensure compliance with anti-bribery laws.

3. Reporting and Whistleblowing:

- Employees, subcontractors, and suppliers are required to report any suspected bribery or corruption to Ricardo Gutierrez-Inostroza at ricardo@legacyhb.co.uk.
- Confidential reporting channels will be provided, and all reports will be promptly investigated.

4. Employee Responsibilities:

- Ensure compliance with this policy in all business dealings.
- Avoid situations where personal or financial interests conflict with company duties.
- Complete any anti-bribery training provided by the company.

5. Supplier and Subcontractor Obligations:

- All suppliers and subcontractors must adhere to this policy and include anti-bribery clauses in their contracts with Net Gain Solutions or entities within the group.
- Report any concerns or breaches immediately.

6. Training and Communication:

- Provide regular training for employees on anti-bribery laws and practices.
- Communicate this policy to all suppliers, subcontractors, and relevant third parties.

Responsibilities:

The senior management team is responsible for ensuring compliance with this policy. All employees and subcontractors must understand and adhere to it.

Monitoring and Review:

This policy will be reviewed annually or when significant changes occur in relevant legislation or the company's operations.

For further information or to report concerns, contact Ricardo Gutierrez-Inostroza at ricardo@legacyhb.co.uk.