1. Policy Statement

EGO Technology Group is committed to conducting business in an honest and ethical manner. We take a zero-tolerance approach to bribery and corruption and are committed to acting professionally, fairly, and with integrity in all our business dealings and relationships.

We are bound by the laws of the UK, including the Bribery Act 2010, in respect of our conduct both at home and abroad.

2. Key Terminology & Definitions

Under UK law, it is a criminal offence to:

- Bribe another person: Offering, promising, or giving a financial or other advantage to induce or reward "improper performance."
- Be bribed: Requesting, agreeing to receive, or accepting a financial or other advantage.
- Bribe a Foreign Public Official: To influence them in their capacity as a public official to obtain or retain business.
- Failure to Prevent: A corporate offence where a commercial organisation (like EGO Technology Group) fails to prevent bribery by an "associated person" (e.g., an agent or contractor).

3. High-Risk ITAD & Recycling Scenarios

Within the UK ITAD sector, particular care must be taken regarding:

- Tenders and Procurement: Influencing a Local Authority or NHS Trust procurement officer during a tender process for IT decommissioning.
- Duty of Care & Compliance: Offering "incentives" to Environment Agency (EA) officers or auditors to overlook discrepancies in Waste Transfer Notes (WTNs) or Hazardous Waste Consignment Notes.
- Asset Rebates: Manipulating the "fair market value" of refurbished laptops or servers to provide an unauthorised "kickback" to a client's IT Manager.

4. Gifts, Hospitality, and Expenses

This policy does not prohibit normal and appropriate hospitality (given and received) to or from third parties. However, all such activity must be:

1. Recorded: Entered into the Company Gift & Hospitality Register if the value exceeds £50.
2. Proportionate: Must not exceed what is standard for a UK SME (Small to Medium Enterprise).
3. Timing: Strictly prohibited during active Requests for Quotation (RFQs) or contract renewals.

5. Facilitation Payments and "Kickbacks"

We do not make, and will not accept, facilitation payments (often known as "grease payments") of any kind. These are typically small, unofficial payments made to secure or expedite a routine or necessary action.

All staff must avoid any activity that might lead to, or suggest, that a facilitation payment or kickback will be made or accepted by us.

6. Whistleblowing & Reporting

If you suspect any instance of bribery or corruption, you are encouraged to raise concerns at the earliest possible stage.

- Internal Disclosure: Reports should be made to your Line Manager or the Company Secretary.
- Confidentiality: We are committed to ensuring no one suffers any detrimental treatment (e.g. disciplinary action or victimisation) as a result of reporting in good faith their suspicion that an actual or potential bribery offence has taken place.

7. Governance and Training

- Training: All employees will receive relevant training on how to implement and adhere to this policy.
- Annual Review: The board of directors will monitor the effectiveness of this policy and review it annually to ensure it remains fit for purpose.

Important: Breach of this policy may result in summary dismissal for gross misconduct. It may also result in personal criminal liability, including an unlimited fine and up to 10 years' imprisonment.