

Anti-bribery and corruption policy

OWNER: AMRIT KHAREL, DIRECTOR, UK OPERATIONS

LAST REVIEWED: SEPTEMBER 2026

NEXT REVIEW: SEPTEMBER 2027

Purpose

This policy sets out the position of Kyros Software Ltd (Co. 16915277) on bribery and corruption. It provides guidance to all staff and associates on recognising and avoiding bribery, in compliance with the UK Bribery Act 2010.

Scope

This policy applies to all staff, contractors, subcontractors, agents and anyone acting on behalf of the company, in all jurisdictions where we operate.

Our position

Kyros Software Ltd has a zero-tolerance approach to bribery and corruption. We do not offer, promise, give, request or accept bribes in any form. This applies whether dealing with public officials, private sector organisations or individuals.

What constitutes bribery

Under the Bribery Act 2010, bribery includes:

- Offering or giving a financial or other advantage to induce someone to perform their role improperly
- Requesting or accepting a financial or other advantage in return for performing one's role improperly
- Bribing a foreign public official to obtain or retain business
- Failure to prevent bribery by persons associated with the organisation

Gifts and hospitality

Gifts and hospitality must be reasonable, proportionate and transparent.

Gifts or hospitality must never be offered or accepted where they could influence, or appear to influence, a business decision.

Cash gifts are never acceptable.

Any gift or hospitality with a value exceeding £50 must be reported to the Director and recorded.

Particular care must be taken when dealing with public sector clients, where even modest gifts may be inappropriate.

Facilitation payments

Facilitation payments — small payments made to speed up routine government actions — are illegal under the Bribery Act 2010 and are prohibited.

Political and charitable donations

The company does not make political donations.

Charitable donations are made only with the Director's approval and are never linked to business advantage.

Due diligence

Before engaging subcontractors, agents or business partners, we carry out proportionate due diligence to assess bribery and corruption risk. Higher-risk relationships (e.g. those involving public sector procurement or overseas jurisdictions) receive additional scrutiny.

Reporting

Anyone who suspects or witnesses bribery or corruption must report it immediately to the Director at info@kyrosweb.com. Reports can also be made under the company's whistleblowing policy. Reports made in good faith will be treated confidentially and the reporter will be protected from retaliation.

If there is reason to believe a criminal offence has been committed, the matter may be reported to the police or the Serious Fraud Office.

Consequences

Breach of this policy is a serious disciplinary matter and may result in dismissal. It may also constitute a criminal offence carrying penalties including unlimited fines and imprisonment.

Record keeping

We maintain records of:

Gifts and hospitality given and received

Due diligence conducted on third parties

Any reports of suspected bribery and the outcome of investigations

Review

This policy is reviewed annually. The next review is due September 2027.