

ANTI BRIBERY AND CORRUPTION POLICY

Living Our THREAD Values

1. Purpose and Commitment

Optimas OE Solutions Ltd (“Optimas”) is committed to conducting business with honesty, integrity, and transparency. We take a zero-tolerance approach to bribery and corruption in all forms.

This Policy sets out Optimas’ position on bribery and corruption and defines the standards of conduct expected of all employees, officers, directors, contractors, and third parties acting on Optimas’ behalf, in compliance with the UK Bribery Act 2010 and other applicable laws.

This Policy is an integral part of our Code of Conduct and reflects our core values - THREAD.

2. Scope and Application

This Policy applies to all Optimas employees, directors, and officers; temporary workers, contractors, consultants, and agents; suppliers, distributors, and other third parties acting for or on behalf of Optimas.

Compliance with this Policy is mandatory.

3. THREAD Values in Action

Teamwork - We work collaboratively and responsibly, ensuring our actions do not expose Optimas, our colleagues, or our partners to legal or ethical risk. Bribery and corruption undermine trust and teamwork and will not be tolerated.

Honesty - We act with integrity in all business dealings. We do not offer, give, request, or accept bribes or improper advantages. We do not misrepresent facts, conceal conduct, or falsify records. Honesty is the foundation of our business relationships.

Respect - We respect the law, our stakeholders, and fair competition. We do not seek to influence decisions through improper means. We interact ethically with customers, suppliers, public officials, and business partners. Respect includes respecting legal boundaries and ethical norms in every jurisdiction where we operate.

Excellence - We maintain high standards of compliance and governance. We implement controls to prevent bribery and corruption. We ensure our processes, records, and approvals reflect best practice. We manage third-party risks proportionately and diligently.

Accountability - We are responsible for our actions and decisions. Everyone at Optimas is accountable for complying with this Policy. Leaders are expected to set the tone and role-model ethical behaviour. Breaches will be investigated and addressed appropriately.

Drive - We pursue sustainable success through ethical conduct. We do not sacrifice integrity for short-term gain. We are proactive in identifying and addressing corruption risks. We act decisively when issues arise.

4. Zero-Tolerance Position

Optimas strictly prohibits bribery, facilitation payments, kickbacks, or improper inducements, offering or receiving anything of value intended to influence a business decision, indirect bribery through third parties or intermediaries. This prohibition applies regardless of local customs or practices.

5. Gifts, Hospitality, and Entertainment

Gifts and hospitality must be reasonable, proportionate, and infrequent; must never influence, or appear to influence, business decisions; must comply with Company policies and applicable laws; must be accurately recorded where required. Cash or cash equivalents are strictly prohibited. Excessive or inappropriate gifts or hospitality must be declined and reported.

6. Public Officials and High-Risk Interactions

Extra care must be taken when dealing with government officials, state-owned entities, defence, customs, or regulatory authorities. Anything of value offered to a public official must be lawful, transparent, and approved in advance in accordance with Company procedures.

7. Third-Party Relationships

Optimas may be held liable for bribery committed by third parties acting on its behalf. Accordingly third parties must be risk-assessed and appropriately vetted, contracts must include anti-bribery commitments where required, suspicious behaviour must be escalated immediately.

8. Accurate Records and Financial Controls

All business records, invoices, and expense reports must be complete, accurate, and truthful, reflect the true nature of transactions, never conceal or mischaracterise payments. False or misleading records are strictly prohibited.

9. Reporting and Speaking Up

All employees and relevant third parties must promptly report suspected bribery or corruption, requests for improper payments or advantages, concerns about third-party conduct.

Reports can be made through line management, Legal / Compliance, or the Company's designated whistleblowing channel.

10. No Retaliation

Optimas strictly prohibits any form of retaliation against individuals who, in good faith raise a concern; or assist in an investigation. Retaliation is itself a serious violation of Company policy.

11. Compliance, Training, and Consequences

Regular training and awareness activities support compliance with this Policy. Breaches may result in disciplinary action, termination of employment or contract, and potential legal action.

12. Review and Continuous Improvement

This Policy is reviewed periodically to ensure continued compliance with legal requirements, alignment with best practices, effectiveness in managing bribery and corruption risks.

Our Commitment

By living our THREAD values and adhering to this Policy, Optimas OE Solutions Ltd protects its reputation, builds trust, and ensures sustainable, ethical business success.