

SKS Technologies Anti-Bribery and Corruption Policy

Introduction

SKS Technologies Group Limited and all its subsidiaries (**SKS** Technologies) are market-leading providers of audio-visual products, solutions and electrical and communications cabling, servicing a wide range of industries including commercial, retail, health, defence, and education markets. Our expertise lies in delivering high-quality and innovative solutions to meet the unique needs of our clients in these sectors.

SKS is committed to ensuring compliance with its Anti-Bribery and Corruption (ABC) obligations in the countries in which it operates. This means that **SKS** is committed to conducting its business with a high standard of honesty, integrity and transparency thus ensuring high ethical standards are demonstrated in all our actions and business relationships.

Our Anti-Bribery and Corruption Policy establishes our principles, procedures, and guidelines to prevent bribery and corruption in all our business activities.

Policy statement

SKS prohibits any form of bribery, corruption or improper behaviour in all its operations and business relationships. We are committed to maintaining a zero-tolerance approach to bribery and corruption and will take strict action against any individual or entity associated with us found engaging in such activities.

SKS fosters a culture of transparency, honesty, and ethical behaviour, ensuring that all employees, contractors, agents, and business partners are aware of and adhere to this policy.

Scope

This policy applies to **SKS** employees, its directors (executive and non-executive), third-party suppliers and third parties acting for or on behalf of **SKS**. The policy covers any activity or behaviour undertaken during the course or in connection with employment or acting on behalf of **SKS** regardless of the geographical location in which that activity or behaviour occurs.

What is bribery and corruption?

Bribery

Is the offering, promising, giving, accepting, or soliciting of an advantage as an inducement for action that is illegal, unethical or a breach of trust? A bribe is an inducement or reward offered, promised, or provided to gain any commercial, contractual, regulatory or personal advantage and can take the form of gifts, loans, fees, rewards or other advantages.

Corruption

Is the abuse of entrusted power for private gain.

Prohibited activities

Bribery

All forms of bribery, including but not limited to offering, giving, receiving, or soliciting bribes, kickbacks, or facilitation payments, are strictly prohibited.

Conflicts of Interest:

Employees must disclose any personal, financial, or other interests that may conflict with their responsibilities whilst engaged by **SKS**. Conflicts of interest must be managed appropriately in accordance with the **SKS**

Technologies Conflict of Interest Policy, avoiding any situations that compromise the integrity of the **SKS** operations.

Improper payments

No payments shall be made or received outside of the regular and approved channels, including payments made to third parties, agents or consultants without proper documentation and justification.

Compliance with laws and regulations

SKS is committed to complying with all applicable anti-bribery and corruption laws and regulations, both internationally and locally.

All persons engaged by **SKS** must familiarise themselves with the relevant laws and regulations applicable to their roles and responsibilities and always ensure compliance.

Due diligence

SKS will conduct due diligence on employees, agents, contractors, and business partners to assess their integrity, reputation and compliance with anti-bribery and corruption standards.

Due diligence procedures will be proportionate to the level of risk associated with the engagement and shall include appropriate background checks, reference verifications, and compliance screenings.

Identification and disclosure

SKS encourages all employees and stakeholders to report any suspicions or concerns regarding bribery or corruption promptly.

Reporting can be done through the designated reporting channels which will ensure confidentiality and protect individuals from retaliation.

If you are unsure whether a particular act constitutes bribery, corruption or any other wrongdoing, or if you have any queries or concerns, it is important to discuss them with your direct manager and or the compliance officer.

SKS understands that employees may not always feel comfortable speaking directly to their managers for various reasons. In such cases, **SKS** has a Whistle Blower Policy that provides certain protections against reprisal, harassment, or demotion for making a report. This policy is in place to ensure that individuals can report concerns or suspicions without fear of adverse consequences.

Communication training and awareness

SKS is committed to providing regular and appropriate anti-bribery and corruption training to all employees and relevant stakeholders.

The training programs will educate individuals about the policy, relevant laws and regulations, and their responsibilities in preventing bribery and corruption.

Failure to comply with the minimum standards set by this policy will be regarded as serious misconduct and may lead to disciplinary action up to and including dismissal, termination of employment or contract, and may be reported to the appropriate authorities.

Monitoring and review

SKS will review this policy 12 months after implementation and every two (2) years thereafter.

Effectiveness of the policy will be assessed through:

- Consultation with employees, the Health and Safety Committee (if applicable), management and where applicable to stakeholders
- Review of the policy by management and committee to determine if objectives have been met and to identify any incidences or occurrences which affect this policy through active monitoring.

Manager Sign:



Date: 01/07/2024

Review Date: 01/07/2026

P27 Version: V2