

## BRIBERY ACT 2010 – POLICY STATEMENT

GRM Development Solutions Limited (GRM) operates a zero tolerance policy in respect of any bribery or corruption. The penalties are severe and include up to 10 years imprisonment for individuals and an unlimited fine for companies as well as adverse publicity and damage to reputation.

GRM's policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners ("Representatives").

GRM and its Representatives will never seek, accept or give a bribe, facilitation payment, kickback or other improper payment. We will always ensure that we operate with appropriate transparency in all our business dealings. Combating bribery is fundamentally about common sense and creating a culture of ethical behaviour.

The Bribery Act is not about curtailing legitimate and proportionate corporate entertainment which is an important device in establishing and maintaining good relationships - it is about stopping bribery and corruption.

GRM will promote employee awareness of, and compliance with, company policies against bribery and corruption through appropriate dissemination of our own procedures (including disciplinary procedures) policies and employment contracts.

GRM will raise awareness of the need to combat bribery and corruption with our business partners by publication of this Policy and (where appropriate) relevant contractual provisions and support initiatives designed to reduce the risk of bribery and corruption. GRM will look to its business partners and supply chain to adopt similar policies to GRM.

If GRM staff are offered a bribe, or are asked to make one, or suspect that any bribery, corruption or other breach of this policy has occurred or may occur, they must report it to a Director or the HR Manager as soon as possible.

All Representatives should be reassured that they will not suffer any recriminations for refusing to take part in bribery or corruption, or for reporting business wrongdoing including bribery.

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for gross misconduct.

**Signed on behalf of GRM Development Solutions Ltd. Board of Directors:**



Richard Upton  
Director

**Date: 21<sup>st</sup> January 2026**