



# HARDIUM

## Anti-Bribery & Ethics Policy

Bribery Act 2010, good corporate  
governance aligned

**Document Reference:** HARD-ETH-POL-001

**Version:** 1.0

**Date:** 16<sup>th</sup> DEC 2025

**Owner:** Director

**Approved By:** David Hardy, Founder & Director

### Purpose

Hardium Ltd is committed to conducting business ethically, transparently and with integrity.

This policy sets out Hardium's zero-tolerance approach to bribery, corruption and unethical behaviour.

### Scope

This policy applies to all Hardium personnel, associates, contractors and partner SMEs acting on Hardium's behalf.

### Principles

Hardium prohibits:

- ✓ Bribery in any form
- ✓ Facilitation payments
- ✓ Improper inducements
- ✓ Undisclosed conflicts of interest
- ✓ Any behaviour intended to improperly influence decisions

This applies to dealings with clients, regulators, suppliers, partners and public officials.

### Gifts and Hospitality

Reasonable, proportionate hospitality may be accepted or offered where it is:

- ✓ Infrequent
- ✓ Modest in value
- ✓ Transparent
- ✓ Not intended to influence decision-making

Cash or cash-equivalent gifts are not permitted.

### Conflicts of Interest

Actual or potential conflicts of interest must be declared promptly and managed transparently

in line with Hardium governance arrangements.

### Speaking Up

Hardium encourages open reporting of concerns and protects individuals who raise issues in good faith.

No retaliation will be tolerated.

### Roles & Responsibilities

#### Founder & Director

- ✓ Overall accountability
- ✓ Policy enforcement

#### All Personnel and Associates

- ✓ Comply with this policy
- ✓ Act with integrity
- ✓ Raise concerns

### Review

This policy is reviewed annually or following legislative or organisational change.

### Approval

David Hardy

**Founder & Director**

**Hardium Ltd**



