



P O L I C Y 0 2 O F 1 6

Anti-Bribery & Corruption Policy

Real partnership. Real expertise.

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Policy owner	Adam O'Neill, Director
Approved by	Stevie MacGregor
Classification	Public — available on request

SOMA Project Controls Ltd

www.somaprojectcontrols.com

1. Purpose

This policy sets out SOMA Project Controls Ltd's commitment to conducting business ethically and free from bribery and corruption, in compliance with the UK Bribery Act 2010 and equivalent legislation in the jurisdictions in which we operate.

2. Scope

This policy applies to all directors, employees, associates, contractors, consultants and any third party acting for or on behalf of SOMA.

3. Policy Statement

SOMA has a zero-tolerance approach to bribery and corruption. We will not offer, promise, give, solicit or accept any bribe or improper payment — directly or through a third party — to obtain or retain business, to influence a decision, or for any other reason. We will act with integrity and professionalism in every client and supplier relationship.

4. What We Mean by Bribery

A bribe is a financial or other advantage offered, promised or given to induce a person to perform a function improperly, or to reward them for doing so. A bribe can take many forms, including cash, gifts, entertainment, services, favours, employment offers, charitable donations and political contributions. Both the offer and the receipt are unlawful.

5. Gifts & Hospitality

Modest, reasonable, infrequent and transparent hospitality is an accepted part of doing business. Gifts and hospitality offered or received must:

- Never be cash or a cash equivalent.
- Be proportionate, occasional and appropriate to the business relationship.
- Not create any obligation or expectation of reciprocation.
- Be declared in the gifts and hospitality register where the value exceeds £50.
- Never be offered or received during a live tender or negotiation.

6. Facilitation Payments & Kickbacks

Facilitation payments — small unofficial payments made to expedite a routine action — are prohibited, regardless of local custom. Kickbacks in any form are prohibited.

7. Charitable & Political Donations

Charitable donations are made openly and only to legitimate, registered charities; they are never made to win or retain business. Political donations are not made by SOMA.

8. Third Parties

Third parties acting for SOMA can expose us to bribery risk. Risk-based due diligence is carried out on agents, associates and significant suppliers, and anti-bribery terms are flowed down contractually.

9. Record Keeping

All accounts, invoices, expense claims and other documents relating to dealings with third parties must be prepared and maintained accurately and transparently. False, misleading or incomplete records are prohibited.

10. Raising a Concern

If you suspect a breach of this policy you must raise it immediately — to your line manager, to the Director, or confidentially under the Whistleblowing Policy. SOMA will not tolerate retaliation against anyone raising a concern in good faith.

11. Consequences of Breach

Breach of this policy is a disciplinary matter and may result in termination of employment or engagement. Individuals may also face personal criminal liability, including imprisonment. SOMA will cooperate fully with any law-enforcement investigation.

12. Review & Governance

This policy is reviewed at least annually, and sooner if legislation, SOMA Project Controls Ltd's operating context or client requirements change materially. The Director is the accountable owner. Minor amendments are logged in the version-control table; material changes trigger a re-issue and fresh sign-off by the policy owner and approver named on the sign-off page.

S I G N E D & A P P R O V E D

Policy Adoption & Approval

This policy is formally adopted by SOMA Project Controls Ltd. It is communicated to all employees, associates and, where relevant, supply-chain partners, and is available on request to clients, prospective clients and other interested parties. The signatures below record its adoption and the date from which it takes effect.

P O L I C Y O W N E R

Adam O'Neill

Adam O'Neill

Director

SOMA Project Controls Ltd

Date: March 2026

A P P R O V E D B Y

Stevie MacGregor

Stevie MacGregor

Director

SOMA Project Controls Ltd

Date: March 2026

N e x t s c h e d u l e d r e v i e w

March 2027