Anti-bribery Policy

Matrix iQ
CONNECTING TECHNOLOGY WITH INTELLIGENCE

Our commitment

At Matrix iQ, we believe in doing business the right way – honestly, ethically, and with professionalism. We have zero tolerance for bribery or corruption. We follow clear procedures to prevent it and expect everyone we work with to uphold the same high standards. This is how we stay accountable, make a difference, and earn trust from our customers and partners.

Who's responsible?

- **Chief Financial Officer**: ensures this policy is applied consistently across the company.
- **Everyone** (employees, directors, contractors, and third parties): must help uphold this policy.
- Preventing, spotting, and reporting bribery is a **shared responsibility**. It's part of our team spirit and commitment to doing what's right.

Why this policy exists

We follow anti-bribery laws wherever we operate, including the UK Bribery Act 2010. If local laws differ, we follow whichever sets the higher ethical standard. This reflects our value of professionalism and our drive to make a positive impact.

Who must follow this policy?

This policy applies to:

- All employees (permanent, temporary, contract)
- Volunteers, agents, and sponsors
- Third parties including suppliers, distributors, contractors, and advisers
- Anyone acting on behalf of Matrix iQ

What is bribery?

Bribery means offering, giving, receiving, or requesting something valuable to gain an unfair advantage. It includes:

- Giving or receiving bribes
- Bribing foreign public officials
- Failing to prevent bribery by someone working for Matrix iQ

Bribery undermines innovation, damages trust, and goes against everything we stand for.

Gifts and hospitality

Gifts and hospitality are allowed only if:

- They're not intended to influence decisions unfairly
- They comply with local laws
- They're given openly and in Matrix iQ's name
- They don't involve cash or cash equivalents
- They're reasonable in value and timing

All gifts and hospitality must be reported to your line manager. Transparency is key to maintaining professionalism and accountability.

What's not allowed

You must not:

- Offer or accept anything to gain an unfair business advantage
- Make payments to speed up routine government actions ("facilitation payments")
- Accept gifts or payments that seem suspicious
- Retaliate against anyone who refuses to take part in bribery or reports concerns

- Do anything that could break this policy or damage our reputation

We expect everyone to act with integrity and uphold our customer-centric values—even when no one's watching.

Charitable donations & sponsorship

We support causes that make a difference. But we only give or accept donations and sponsorships that are legal, ethical, and follow our internal rules. They must never be used to gain improper influence.

Keeping records

We keep clear, accurate records of all gifts, hospitality, and payments. These records must show the **business reason** behind each transaction. This helps us stay accountable and maintain trust.

Reporting concerns

Speak up if:

- You're offered or asked to give a bribe
- You suspect bribery might happen
- You think you've witnessed unlawful activity

Report concerns to your line manager or the Head of People & Culture. Reports will be treated as whistleblowing under our policy. Third parties can also report concerns to a member of the Senior Leadership Team, including the Head of People & Culture. We encourage a culture of openness and team spirit – raising concerns helps protect everyone.

Consequences

Breaking this policy may lead to:

- Disciplinary action or dismissal
- Ending contracts with consultants or contractors
- Legal penalties under the Bribery Act:
    - Up to 10 years in prison
    - Unlimited fines
    - Serious reputational damage

We take this seriously because our reputation is built on professionalism and doing the right thing.

Communication & monitoring

We share our zero-tolerance stance with clients, suppliers, and partners. The Head of People & Culture monitors how well this policy works. Everyone is responsible for making it a success.

If you see something wrong, speak up. That's how we protect our values and continue to innovate with integrity.

- Retaliate against anyone who refuses to take part in bribery or reports concerns
- Do anything that could break this policy or damage our reputation

Charitable donations & sponsorship

We only give or accept donations and sponsorships that are legal, ethical, and follow our internal rules.

Keeping records

We keep clear records of all gifts, hospitality, and payments. These must show the business reason behind them.

Reporting concerns

Tell your line manager immediately if:

- You're offered or asked to give a bribe
- You suspect bribery might happen
- You think you've witnessed unlawful activity

If you can't speak to your manager, contact the Head of People & Culture. Reports will be treated as whistleblowing under our whistleblowing policy. Third Parties can also report concerns to the Head of People & Culture.

Consequences

Breaking this policy may lead to:

- Disciplinary action or dismissal
- Ending contracts with consultants or contractors
- Legal penalties under the Bribery Act:
    - Up to 10 years in prison
    - Unlimited fines
    - Serious reputational damage

Communication & monitoring

We'll share our zero-tolerance stance with clients, suppliers, and partners. The Head of People & Culture monitors how well this policy works. Everyone is responsible for making this policy a success. Speak up if you see anything wrong.