DOORSET Technologies

Anti-Bribery and Corruption Policy and Procedure

1. Introduction

Doorset Technologies Ltd (the Company) values its reputation for ethical behaviour and for financial probity and reliability. It recognises that over and above the commission of any crime, any involvement in bribery will also reflect adversely on its image and reputation.

The Bribery Act 2010 came into force in July 2011, superseding previous legislation. Notably, it made failing to prevent bribery a corporate offence. It also made bribing a foreign public official an individual criminal offence.

Bribery or corruption by Company employees will be treated as a serious disciplinary offence. Should it occur, the Company will take firm action, which may include dismissal and legal action.

2. Scope

This policy applies to every employee, including temporary, agency and voluntary workers. It applies to all activities of the Company.

The Company expects anyone acting on its behalf to have procedures in place to prevent bribery and corruption. This includes agents and others who represent the Company, and suppliers who perform services for the Company in the UK and in other countries.

3. Standards

The Company prohibits the offering, giving, solicitation or acceptance of any bribe (whether cash or other inducement):

- to or from any person or company (wherever they are situated and whether they are a public official or body or private person or company);
- by any individual employee, agent or other person or body acting on behalf of the Company;
- in order to gain any commercial, contractual or regulatory advantage for the Company in a way that is unethical;
- in order to gain any personal advantage (pecuniary or otherwise) for the individual or anyone connected with the individual.

This policy prohibits any inducement that results in a personal gain or advantage to the recipient or any person or body associated with them, and which is intended to influence them to take action that may not be solely in the interest of the Company or of the person or body employing them or whom they represent.

The policy is not meant to prohibit normal and appropriate hospitality or the giving of a gift on a festival or at another special time, providing they are customary in a particular market, are proportionate and are properly recorded.

Inevitably, decisions as to what is acceptable may not always be easy. If you are in any doubt as to whether a potential act constitutes bribery, the matter should be referred to a director before proceeding.

4. Employees' Responsibility

The prevention, detection and reporting of bribery is the responsibility of all employees, and the Company is committed to:

- encouraging employees to be vigilant and to report any suspicion of bribery;
- providing employees with suitable channels of communication and ensuring that sensitive information is treated appropriately;
- investigating instances of alleged bribery and assisting the police and other appropriate authorities in any resultant prosecution;
- taking disciplinary action against any individual(s) involved in bribery.

Employees must abide by the Company's financial regulations on gifts and hospitality, to be recorded in the Register of Gifts and Hospitality (Appendix One). These require that, with the exception of low-value gifts worth less than £50 or hospitality worth less than £50 per person, employees must seek written permission from a director before accepting gifts or hospitality from potential or existing suppliers or their agents. Under no circumstances must the receipt of gifts or hospitality influence the choice of a supplier, and, if there is any doubt, gifts and/or hospitality should be refused.

Employees should advise a director, who will maintain the Register of Gifts and Hospitality.

5. Training and its Objectives

Training will be provided to help employees understand their duties under UK anti-bribery and corruption legislation. Anyone involved in purchasing or sales should complete this training regularly. The objectives of the training are that participants will be able to:

- understand what bribery is (direct and indirect forms of bribery);
- understand the Bribery Act 2010;
- identify instances of corruption and feel confident about reporting them;
- anticipate difficult situations and take the necessary steps to avoid them;
- deal with ethical dilemmas in the workplace;
- understand that the onus is on the individual to comply with the Act;
- apply the knowledge acquired in the course to comply with the Act;
- instil respect for the law and inspire an ethical approach amongst all colleagues.

6. Exceptions

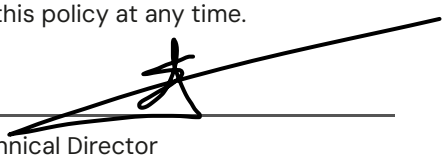
The Company recognises that exceptional circumstances might arise in which an employee's refusal to offer or accept a bribe might cause immediate personal danger to that individual. In such circumstances, a payment may be offered or accepted, but this must be reported and recorded at the time of the event or as soon as possible thereafter.

7. Implementation and Monitoring

The implementation of this policy will be monitored, and a review of its effectiveness carried out at least annually. The company's directors will be responsible for monitoring and reviewing this policy.

8. Disclaimer

This policy does not form any part of an employee's contract of employment, and the Company may amend, suspend or withdraw this policy at any time.

Signed:  Name: Achilleas Sarrigiannidis

Role: Technical Director Date: 27/11/2026

Register of Gifts and Hospitality

Appendix One

Name	Position	Date offered	Accepted / rejected	Date recorded	Gift / hospitality	Accompanied to event (Y/N)	Received from	Value (£)