

Anti-Bribery Policy

Policy Statement:

HF Recycle Limited is committed to conducting business with the highest ethical standards and in compliance with all applicable laws and regulations, including the UK Bribery Act 2010. This Anti-Bribery Policy outlines our commitment to preventing bribery and corrupt practices in all aspects of our operations.

1. Prohibition of Bribery: HF Recycle Limited strictly prohibits the offering, giving, receiving, or solicitation of bribes, kickbacks, facilitation payments, or any other form of corrupt activity, whether directly or indirectly, by any employee, contractor, agent, or representative acting on behalf of the company.

2. Compliance with Laws: We will comply with all applicable laws and regulations related to anti-bribery and corruption, including the UK Bribery Act 2010, as well as any relevant international laws.

3. Gifts, Hospitality, and Expenses: We recognise that legitimate business relationships may involve the giving and receiving of gifts, hospitality, or reasonable expenses. However, such actions must always be within the boundaries of legality, transparency, and ethical standards. All employees must adhere to the company's Gifts and Hospitality Policy when engaging in such activities.

4. Risk Assessment and Due Diligence: We will conduct regular risk assessments to identify potential bribery risks within our operations, business relationships, and supply chains. Due diligence procedures will be implemented to ensure that our business partners, agents, and contractors are also committed to anti-bribery practices.

5. Reporting Mechanism: We will establish a confidential and accessible reporting mechanism that allows employees, contractors, suppliers, customers, and other stakeholders to report any concerns or suspicions of bribery or corrupt activities. Reports will be taken seriously, and appropriate actions will be taken to investigate and address such concerns.

6. Training and Awareness: We will provide training and awareness programs to our employees and relevant stakeholders to ensure a clear understanding of anti-bribery laws, policies, and procedures. This will enable them to recognize and prevent potential bribery situations.

7. Compliance Monitoring and Review: We will regularly review and update our Anti-Bribery Policy and associated procedures to ensure their effectiveness. Compliance with this policy will be monitored, and any necessary corrective actions will be taken to address non-compliance.

Responsibility:

The responsibility for implementing and maintaining this Anti-Bribery Policy rests with the management team of HF Recycle Limited. All employees, contractors, agents, and representatives are expected to support and adhere to the principles outlined in this policy.

By signing below, I acknowledge that I have read and understood the HF Recycle Limited Anti-Bribery Policy and agree to comply with its principles and requirements.

A handwritten signature in black ink, appearing to read 'Jadav V', with a horizontal line underneath.

Mr. Vrushabh Jadav

Recycling Plant General Manager, HF Recycle Limited.

Date: 01/10/2021