

Spitfire.com Anti-Bribery and Corruption Policy

1. Policy Statement

Spitfires.com is committed to conducting business ethically and in compliance with the UK Bribery Act 2010. We have zero tolerance for bribery and corruption and are committed to acting professionally, fairly, and with integrity in all our business dealings.

2. Scope

This policy applies to all employees (permanent, temporary, or casual), directors, trustees, agents, consultants, and any third parties acting on behalf of Spitfires.com in the UK or abroad.

3. What is Bribery?

A bribe is a financial or other advantage offered, promised, given, requested, accepted, or received to induce or reward improper performance of a relevant function or activity.

4.

- **Examples:** Offering cash, excessive gifts, or hospitality to secure a contract; receiving tickets to a sporting event from a supplier to influence a procurement decision.

5. Gifts and Hospitality

- Employees must not accept gifts or hospitality that could influence, or be seen to influence, business decisions.
- Gifts must be reasonable, proportionate, and transparent.
- All gifts above [£100] must be declared in the [Gift Register].

5. Facilitation Payments

Facilitation payments (small, unofficial payments to secure or speed up routine government actions) are prohibited under this policy.

6. Charitable Donations

Spitfires.com only makes charitable donations that are legal and ethical under local laws. No donation must be offered without prior approval of The Company Director Matt Jones.

7. Employee Responsibilities

- All staff must read, understand, and comply with this policy.
- Any employee who breaches this policy may face disciplinary action, up to and including summary dismissal.

8. Reporting and Whistleblowing

Employees are encouraged to raise concerns about any instance of bribery or corruption at the earliest possible stage to Mark Hillier Chief Operations Officer

9. Monitoring and Review

Spitfires.com will regularly review this policy to ensure it remains effective and compliant with legal requirements.