FreeClix Ltd. Anti-Bribery and Corruption Policy v2.0

1 Oct 2026

Policy statement and scope

FreeClix Ltd. has a zero-tolerance approach to bribery and corruption. We are committed to acting professionally, fairly and with integrity in all our business dealings and relationships, wherever we operate, and to complying with the Bribery Act 2015.

This policy applies to everyone working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, agents, consultants, contractors and suppliers. It covers our dealings with customers, resellers, suppliers, public bodies and anyone else we do business with.

What bribery is

A bribe is a financial or other advantage offered, promised, given, requested or accepted to encourage someone to act improperly, or to reward them for doing so. The advantage does not have to be money: it can be a gift, hospitality, a job, a favour, a discount or anything else of value. Corruption is the abuse of a position of trust or power for personal gain.

Under the Bribery Act 2015 it is a criminal offence to:

- offer, promise or give a bribe
- request, agree to receive or accept a bribe
- bribe a foreign public official
- as a commercial organisation, fail to prevent bribery by anyone acting on our behalf

Individuals found guilty can face up to ten years in prison and an unlimited fine. The company can face an unlimited fine and lasting damage to its reputation, and can lose contracts. The only defence to the corporate offence is to show that we had adequate procedures in place to prevent bribery, which is why this policy matters.

What is not acceptable

You must not, directly or through anyone else:

- offer, promise or give a bribe or any improper payment or advantage to anyone, to win or keep business or to gain any advantage for FreeClix
- request, agree to receive or accept a bribe, or any advantage that is intended to influence, or could appear to influence, your judgement
- make or accept facilitation payments, which are small unofficial payments made to speed up or secure a routine action, such as to an official
- accept or give kickbacks, secret commissions or rebates, including to or from customers, resellers, suppliers or introducers

- bribe a public official, in the UK or abroad, or give them anything of value to influence their decision
- threaten or retaliate against anyone who refuses to pay or accept a bribe, or who raises a concern
- do anything that would put FreeClix in breach of this policy, or ask someone else to

If you are ever unsure whether something is acceptable, ask before you act.

Gifts and hospitality

Modest gifts and reasonable hospitality are a normal part of business, but they must never be used to influence a decision or be given or accepted in return for one. Any gift or hospitality must be lawful, proportionate, transparent, given openly and not tied to a decision that is about to be made, such as a tender or contract renewal.

Situation	What to do
Occasional gift or hospitality of modest value, equal to or under £50, such as a working lunch or branded item	Acceptable. Record it in the register
Gift or hospitality over £50, or frequent from the same source	Get approval from the Managing Director before giving or accepting, and record it
Cash or cash equivalents, such as vouchers, in any amount	Never acceptable
Anything given or received during a tender, negotiation or contract renewal	Never acceptable
Anything lavish, secret, or that would embarrass FreeClix if it became public	Not acceptable

Gifts and hospitality offered to or by public officials need prior approval from the Managing Director in every case. The register of gifts and hospitality is kept by [role] and reviewed at least once a year.

Donations and sponsorship

FreeClix does not make political donations. Charitable donations and sponsorship are allowed only where they are genuine, lawful and approved in advance by the Managing Director, and where they are not connected to winning or keeping business or to any decision involving the recipient. Any donation or sponsorship must be recorded accurately and paid to the organisation itself, never to an individual.