

Anti-Bribery and Corruption Policy

Total Engineering Management Ltd. recognises that bribery and corruption have an adverse effect on business. Failure to identify and act upon bribery or corruption can break laws and basic human freedoms, distorting free trade and competition.

Our definitions of bribery and corruption are below:

Bribery is the act of taking or receiving something with the intention of influencing the recipient in some way favourable to the party providing the bribe;

Corruption is giving or obtaining advantage through means which are illegitimate, immoral, and/or inconsistent with one's duty or the rights of others.

Company statement

Total Engineering Management Ltd will not tolerate any form of Bribery or Corruption and seeks to act with honesty and integrity in all of its business dealings. We will immediately and thoroughly investigate any allegations of bribery or corruption and will take the strongest action. Any breach of policy by any employee will be considered as grounds for disciplinary action and may be considered to be gross misconduct. A breach by a contractor, consultant or agent will be considered grounds to terminate any contract or agreement with that individual or company.

Laws and regulations

Total Engineering Management Ltd is committed to applying high standards of honesty and integrity across our business. Our Bribery and Corruption Policy mirrors the statutory requirements applicable in the UK.

Policy and practices

Total Engineering Management Ltd Bribery and Corruption Policy applies to all employees, agency workers, consultants, sub-contractors and contractors, irrespective of their level or function they perform within the company. Total Engineering Management Ltd expects our business partners, suppliers, sub-contractors and contractors to act with the utmost integrity and without actions or thoughts involving bribery and/or corruption.

Responsibilities

All employees, consultants, sub-contractors, contractors and agency workers; and any other individual working directly for the business (including agents) are required and agree to operate within the following guidelines:

- To always act with honesty and integrity and support Total Engineering Management Ltd.'s policy relating to bribery and corruption;
- Not to offer or make any bribe, outlandish or unauthorised payment or incentive of any kind to anyone;
- Not to solicit business by offering any bribe, unorthodox or unofficial payment to customers or potential customers.
- Not to accept any kind of bribe, unorthodox or unusual payment or inducement that would not be authorised by Total Engineering Management Ltd in the ordinary course of business.
- To refuse any bribe or outlandish payment and to do so in a manner that is not open to misunderstanding or giving rise to false expectations; and to report any such offers.
- Not to make facilitation payments. These are payments used by businesses or individuals to secure or accelerate a service or product. Total Engineering Management Ltd will not tolerate or overlook such payments being made.
- To report any breaches of the policy.

What to do if you become aware or suspect there is a breach of the policy

If you become aware of Bribery or Corruption or if you suspect Bribery or Corruption has occurred previously you should report this to a director of the company without delay.

Preventative measures

- Any expenditure by the company to third parties relating to gifts or entertainment must be authorised in advance by a director.
- All gifts and gratuities (of any value) must be declared by employees.
- Employees must not receive any gifts or gratuities at their home address.

Gifts and gratuities include: physical gifts; entertainment; corporate hospitality; vouchers; free or discounted goods or services; free or discounted use of facilities, property or any other items from suppliers, clients or third parties.

Signed:



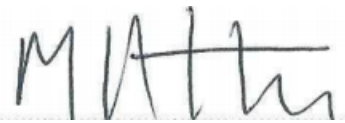
Name: Simon Lee

Position: Director

Date: 5th January 2026

Date of Next Review: 5th January 2027

Signed:



Name: Tom Bentley

Position: Director

Date: 5th January 2026