

Anti-Bribery & Corruption Policy

This policy has been prepared by Soteira Consulting Ltd. to support compliance with the United Kingdom Bribery Act 2010.

1. Policy Statement and Commitment

Soteira Consulting Ltd. is committed to conducting business ethically, transparently, and with integrity. We have a zero-tolerance approach to bribery and corruption and are committed to acting professionally, fairly, and in accordance with all applicable laws.

This policy is issued in accordance with the UK Bribery Act 2010 and sets out our responsibilities, and the responsibilities of those working for or on behalf of the company, in observing and upholding anti-bribery and anti-corruption standards.

2. Scope of the Policy

This policy applies to all individuals working for or on behalf of Soteira Consulting Ltd. in any capacity, including employees, contractors, consultants, agents, and business partners. It also applies to all business activities, whether conducted in the UK or elsewhere.

3. What is Bribery and Corruption

Bribery is the offering, promising, giving, accepting, or soliciting or any advantage as an inducement for an action that is illegal, unethical, or a breach of trust.

Corruption includes the abuse of entrusted power for private gain and may take many forms, including but not limited to:

- Bribes, kickbacks, or facilitation payments
- Improper gifts, hospitality, or expenses
- Conflicts of interest not appropriately declared

4. Gifts, Hospitality, and Expenses

Soteira Consulting Ltd. recognises that proportionate business hospitality and the giving or receiving of modest gifts can be legitimate in building professional relationships. However, such practices must never be used to influence, or appear to influence, business decisions.

Gifts or hospitality must:

- Be reasonable, proportionate, and transparent
- Not be offered or accepted with the expectation of securing an improper advantage
- Comply with applicable laws and professional standards

Cash gifts, facilitation payments, or equivalent incentives are strictly prohibited.

5. Risk Assessment

As a UK-based professional consultancy providing engineering, safety, and assurance services, the overall risk of bribery and corruption within Soteira Consulting Ltd. is considered low. The company does not operate in high-risk jurisdictions and engages a limited supply chain predominantly in the UK.

Notwithstanding this, Soteira Consulting Ltd. recognises that bribery and corruption risks can arise in any organisation and remains committed to maintaining appropriate controls and awareness.

6. Responsibilities and Controls

Soteira Consulting Ltd:

- Prohibits all forms of bribery and corruption
- Expects all individuals working on its behalf to act with integrity and professionalism
- Requires business decisions to be based on merit and objective criteria
- Reserves the right to terminate business relationships where bribery or corruption is identified

Due diligence and controls are applied proportionately to the nature and scale of the company's activities.

7. Reporting Concerns

All individuals working for or on behalf of Soteira Consulting Ltd. are encouraged to report any concerns or suspicions relating to bribery or corruption.

Concerns should be raised directly with the Company Director. All reports will be taken seriously, investigated appropriately, and treated confidentially wherever possible. No individual will suffer retaliation or adverse treatment for raising a concern in good faith.

8. Training and Awareness

Soteira Consulting Ltd. is committed to maintaining appropriate awareness of anti-bribery and anti-corruption requirements. Training or information will be provided where proportionate and relevant to the role or engagement.

9. Responsibility, Governance, and Approval

Responsibility for this policy, and for ensuring compliance with the UK Bribery Act 2010, rests with the Company Director. This policy will be reviewed annually, or sooner if required due to changes in legislation or business operations.

This policy is approved and endorsed by the Director of Soteira Consulting Ltd. and reflects the company's commitment to ethical and responsible business practices.



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Date: 2026.02.02 19:08:13

Company Director

Authorised: 2nd February 2026

Next Review: 1st February 2027