

Anti-Bribery and Corruption Policy

Rev. 7

10/04/2026

Introduction

It is AIS Group Companies Limited ("AIS") policy to conduct all business in an honest and ethical manner in accordance with our Employee Code of Conduct. We take a zero-tolerance approach to bribery and corruption, and we are committed to action professionally, fairly and with integrity in all our business dealing and relationships wherever we operate, including through the implementation, maintenance and continuous improvement of effective, proportionate and risk-based systems and controls designed to prevent bribery and corruption.

We will uphold all laws relevant to countering bribery and corruption in all the jurisdictions in which we operate. Nevertheless, we continue to be governed by UK laws, including the Bribery Act 2010, regarding our conduct both domestically and internationally and we will monitor and comply with applicable European Union and local anti-corruption legislation as implemented in the countries in which we operate

This policy applies to all employees, officers, directors, temporary workers, contractors, consultants, agents, intermediaries and any other persons or entities acting for or on behalf of AIS ("Associated Persons").

Definitions

- **Bribery:** Offering, promising, giving, requesting, or accepting an inducement or reward to improperly influence a business or official decision.
- **Corruption:** Abuse of entrusted power for private gain.
- **Facilitation Payments:** Small, unofficial payments made to secure or expedite routine government actions.
- **Gifts and Hospitality:** Items of value given or received in connection with business relationships, including travel, accommodation, entertainment and services.
- **Public official:** any individual holding a legislative, administrative or judicial position, or exercising a public function, for any country of public international organisation.

If you have any doubts relating to potential bribery please speak to your Line Manager or the Compliance function. AIS encourages early escalation of concerns and provides protection against retaliation for anyone raising concerns in good faith. We are dedicated to eliminating corruption and will support you in upholding ethical standards.

Our Policy

We are committed to taking all necessary actions to ensure the following:

1. We will not offer, promise, give, accept, or demand any form of bribe or improper benefit (including excessive gifts or hospitality) to secure business or gain an unfair advantage, whether directly or indirectly through a third party
2. We do not participate in offering or accepting gifts or corporate hospitality intended to influence business decisions or compromise the independence of the recipient.
3. We avoid making gifts to individuals within an organization to prevent any appearance of bribery, particularly where public officials or high-risk third parties are involved
4. We will not accept gifts of significant value, but may accept small, token gifts such as mugs, calendars, or inexpensive pens. If offered a significant gift that would be uncomfortable or impolite to refuse, you may accept it on behalf of the Company, provided it is sent to the head office for company use.
5. Corporate hospitality may be accepted if it involves events open to the public (including access to private boxes at such events), provided that the value is reasonable in relation to the nature of the business relationship and not tied to the expectation of business or continued business dealings. Prior approval from your Line Director is required for accepting corporate hospitality and all such hospitality must be accurately recorded
6. We do not offer or accept kickbacks or any improper payments to suppliers, customers, or business partners. A "kickback" is defined as the return of a sum paid or due in exchange for awarding business or entering into a contract.
7. We actively promote awareness of anti-corruption and anti-bribery policies among employees, ensuring policies and procedures are well-communicated and understood, including through periodic mandatory training for employees in higher-risk roles
8. We fully respect and comply with the anti-corruption policies of our suppliers and customers and we conduct proportionate due diligence on third parties acting on our behalf
9. We do not engage in illegal or inappropriate contributions or payments to public officials, political parties, or organisations and any permitted charitable or political donations must receive prior written approval from senior management.
10. Facilitation payments are strictly prohibited. Any request for a facilitation payment must be refused and immediately reported to management.

Remember, adopt the RIGHT approach to help eradicate corruption:

Responsibility – You are accountable for your actions and must comply with our Anti-Bribery and Corruption Policy. The Company enforces a zero-tolerance stance toward violations of this policy. Any employee found in breach will face disciplinary measures, including potential dismissal. If you break the law, you will be held responsible, and this could result in fines, imprisonment, or both.

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Integrity – Never compromise your integrity. If you suspect something is wrong, always report it. If you're uncertain, consult your manager or use any confidential reporting channels made available by the company. Never allow yourself to be pressured into actions that you know or suspect to be wrong.

Genuineness – Pay fair prices for genuine goods and services. Never overpay in exchange for gifts or promises of hospitality. Overpayments are easily spotted and will be exposed.

Honesty – Always act honestly and in good faith, in every aspect of your work.

Transparency – Maintain accurate records (including all invoices and receipts) of your actions, especially regarding payments and their purposes. Full, accurate documentation ensures complete transparency and shows that you have nothing to hide. False, misleading or incomplete records are strictly prohibited.

Monitoring and Review

This policy will be reviewed regularly by senior management to ensure it remains effective and aligned with applicable UK and EU anti-bribery and corruption legislation.

This policy has been reviewed and approved by



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10/04/2026



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10/04/2026



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