



Anti-Bribery Policy 2025 - 2026

Introduction

One of Future Roots core values is to uphold sound, responsible and fair business operations. It is committed to promoting and maintaining the highest possible ethical standards in relation to all of its business activities. Future Roots reputation for maintaining lawful business practices is of paramount importance to it and this policy is designed to preserve these values. Future Roots therefore has a zero-tolerance policy towards bribery and corruption at any level and is committed to acting fairly and with integrity in all of its business dealings and relationships wherever it operates and implementing and enforcing effective systems to counter bribery.

Purpose and Scope

This policy sets out Future Roots position on any form of bribery and corruption and provides guidelines aimed at:

- Ensuring compliance with anti-bribery laws, rules and regulations, not just within the UK, but also in any other country within which Future Roots may carry out its business or in relation to which its business may be connected;
- Enabling employees and persons associated with Future Roots to understand risks associated with unlawful conduct and to enable and encourage them to be vigilant and to effectively recognise, prevent, avoid and report any wrongdoing, whether by themselves or others;
- Providing suitable and secure reporting and communication channels and ensuring that any information that is reported is properly and effectively dealt with; and
- Creating and maintaining a rigorous and effective framework for dealing with any suspected instances of bribery or other unethical conduct.

This policy applies to all permanent and temporary employees of Future Roots (including any of its intermediaries, subsidiaries or associated companies). It also applies to any individual or corporate entity associated with Future Roots or who performs functions in relation to, or for and on behalf of, Future Roots, including, but not limited to, directors, agency workers, casual workers, contractors, consultants, seconded staff, agents, suppliers and sponsors ("associated persons").

All employees and associated persons are expected to adhere to the principles set out in this policy.

Legal Obligations

The key UK legislation on which this policy is based is the Bribery Act 2010 and it applies to Future Roots conduct both in the UK and abroad.



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The Bribery Act 2010, which came into force on 1 July 2011, makes it an offence for a UK national or person located in the UK to pay or receive a bribe, either directly or indirectly. The Bribery Act covers transactions that take place in the UK or abroad, and both in the public or private sectors.

A bribe is an inducement or reward offered, promised or provided in order to gain any commercial, contractual, regulatory or personal advantage. It is an offence in the UK to:

- Offer, promise or give a financial or other advantage to another person (i.e. bribe a person) whether within the UK or abroad, with the intention of inducing or rewarding improper conduct;
- Request, agree to receive, or accept a financial or other advantage (i.e. receive a bribe) for or in relation to improper conduct;
- Bribe a foreign public official.

You can be held personally liable for any such offence. It is also an offence in the UK for an employee or an associated person to bribe another person in the course of doing business intending either to obtain or retain business, or to obtain or retain an advantage in the conduct of business, for Future Roots. Future Roots can be liable for this offence where it has failed to prevent such bribery by associated persons. As well as an unlimited fine, it could also suffer substantial reputational damage in connection with this offence.

Policy

All employees and associated persons are required to:

- Comply with any anti-bribery and anti-corruption legislation that applies in any jurisdiction in any part of the world in which they might be expected to conduct business;
- Act honestly, responsibly and with integrity; and
- Safeguard and uphold Future Roots core values by operating in an ethical, professional and lawful manner at all times.

Bribery of any kind is strictly prohibited. Under no circumstances should any provision be made, money set aside, or accounts created for the purposes of facilitating the payment or receipt of a bribe.

Future Roots recognises that industry practices may vary from country to country or from culture to culture. What is considered unacceptable in one place may be normal or usual practice in another. Nevertheless, a strict adherence to the guidelines set out in this policy is expected of all employees and associated persons at all times.

If in doubt as to what might amount to bribery or other unethical conduct or might constitute a breach of this policy, you should refer the matter to the Director or a member of the Board.



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The giving of business gifts to clients, customers, contractors and suppliers is not prohibited provided the following requirements are met:

- The gift is not made with the intention of influencing a third party to obtain or retain business or a business advantage, or to reward the provision or retention of business or a business advantage.
- It complies with local laws;
- It is given in Future Roots name, not in the giver's personal name;
- It does not include cash or a cash equivalent (such as gift vouchers);
- It is of an appropriate and reasonable type and value and given at an appropriate time;
- It is given openly, not secretly;
- It is approved in advance by a Director of Future Roots.

Essentially, it is not acceptable to give, promise to give, or offer, a payment, gift or hospitality with the expectation or hope that a business advantage will be received, or to reward a business advantage already given, or to accept a payment, gift or hospitality from a third party that you know, or suspect, is offered or provided with the expectation that it will obtain a business advantage for them.

For the avoidance of doubt, any payment or gift to a public official or other person to secure or accelerate the prompt or proper performance of a routine government procedure or process, otherwise known as a "facilitation payment", is also strictly prohibited. Facilitation payments are not commonly paid in the UK, but they are common in some other jurisdictions.

Sanctions for Breach

Breach of any of the provisions of this policy will constitute a disciplinary offence and will be dealt with in accordance with Future Roots disciplinary procedure. Depending on the gravity of the offence, it may be treated as gross misconduct and could render the employee liable to summary dismissal.

As far as associated persons are concerned, breach of this policy could lead to the suspension or termination of any relevant contract, sub-contract or other agreement with the associated person.