



Anti-Bribery and Corruption Policy

1. Introduction

Solar Dynamics is committed to conducting its business with integrity, transparency, and in compliance with all applicable laws and regulations. As part of this commitment, Solar Dynamics has implemented this Anti-Bribery and Corruption Policy (ABCP) to prevent, detect, and address bribery and corruption in all aspects of its operations.

2. Policy Statement

Solar Dynamics prohibits all forms of bribery and corruption, whether direct or indirect, by its employees, agents, contractors, suppliers, and other business partners. Bribery and corruption are unacceptable practices that undermine trust, fairness, and the integrity of our business transactions. We are committed to maintaining a culture of honesty, accountability, and ethical conduct in all our dealings.

3. Definitions

For the purposes of this policy:

- "Bribery" refers to the offering, giving, receiving, or soliciting of anything of value to influence the actions or decisions of an individual or entity in a business or official capacity.
- "Corruption" encompasses a range of dishonest or fraudulent practices, including embezzlement, kickbacks, nepotism, and abuse of power for personal gain.

4. Compliance with Laws and Regulations

Solar Dynamics will comply with all applicable anti-bribery and corruption laws and regulations, including but not limited to the Foreign Corrupt Practices Act (FCPA) in the United States and the Bribery Act 2010 in the United Kingdom. Employees must familiarise themselves with these laws and ensure their actions adhere to legal requirements.

5. Responsibilities

All employees, regardless of position or seniority, are responsible for upholding this policy and preventing bribery and corruption within the organisation. Key responsibilities include:

- Refraining from offering, accepting, or soliciting bribes or other improper inducements.
- Reporting any suspected or observed instances of bribery or corruption to [Designated Compliance Officer or Department].
- Cooperating fully with internal investigations and law enforcement authorities in matters related to bribery and corruption.

6. Due Diligence and Third-Party Relationships

Before engaging with third parties, such as suppliers, distributors, agents, consultants, or business partners, Solar Dynamics will conduct appropriate due diligence to assess their integrity and compliance with anti-bribery and corruption standards. Contracts and agreements with third parties will include provisions requiring compliance with this policy.

7. Gifts, Entertainment, and Hospitality

Employees must exercise caution when giving or receiving gifts, entertainment, or hospitality to or from clients, suppliers, or other business partners. Such gestures must be modest, reasonable, and consistent with customary business practices. Gifts or hospitality that could be perceived as influencing business decisions are strictly prohibited.

8. Record-Keeping and Accounting

Accurate and transparent record-keeping is essential to prevent bribery and corruption. All financial transactions must be properly documented in accordance with Solar Dynamics accounting policies and procedures. Falsification of records or misrepresentation of financial information is strictly prohibited.

9. Training and Awareness

Solar Dynamics will provide regular training and awareness programs to employees to educate them about the risks of bribery and corruption and to ensure their understanding of this policy.

Training will cover relevant laws, ethical standards, and practical guidance for identifying and addressing bribery and corruption risks in the workplace.

10. Monitoring and Enforcement

Solar Dynamics will monitor compliance with this policy through periodic audits, reviews, and assessments. Any violations of the ABCP will be subject to disciplinary action, up to and including termination of employment. Additionally, Solar Dynamics will cooperate with law enforcement authorities in investigating and prosecuting instances of bribery and corruption.

11. Reporting Procedures

Employees who have concerns or suspicions about potential bribery or corruption are encouraged to report them promptly to [Designated Compliance Officer or Department]. Reports will be treated confidentially, and employees will be protected from retaliation for making good-faith reports.

12. Review and Update

This policy will be reviewed regularly to ensure its effectiveness and relevance to Solar Dynamics' operations. Any updates or revisions to the ABCP will be communicated to all employees and stakeholders.

Solar Dynamics is committed to promoting a culture of integrity, transparency, and ethical behaviour. By adhering to this Anti-Bribery and Corruption Policy, we uphold our values and protect the reputation and interests of our company.

Mike Murphy & Simon Beal - Directors

7th October 2022