

Anti-Bribery and Corruption Policy Statement

The Company is committed to the highest standards of ethical conduct and integrity in its business activities across England, Wales, Scotland, Ireland, and Northern Ireland. This policy outlines the Company's position on preventing and prohibiting bribery, in accordance with the Bribery Act 2010. The Company will not tolerate any form of bribery by, or of, its employees, agents, consultants, or any person or body acting on its behalf. Senior management is committed to implementing effective measures to prevent, monitor, and eliminate bribery. This commitment reflects our core values of quality, integrity, commitment, honesty, and loyalty.

Scope of this Policy

This policy applies to all employees and officers of the Company, as well as to temporary workers, consultants, contractors, agents, and subsidiaries acting for, or on behalf of, the Company ("associated persons") within England, Wales, Scotland, Ireland, and Northern Ireland.

Every employee and associated person acting for, or on behalf of, the Company is responsible for maintaining the highest standards of business conduct. Any breach of this policy is likely to constitute a serious disciplinary, contractual, and criminal matter for the individual concerned and may cause serious damage to the reputation and standing of the Company.

The Company may also face criminal liability for unlawful actions taken by its employees or associated persons under the Bribery Act 2010. All employees and associated persons are required to familiarise themselves with this policy and comply with it, including any future updates issued by the Company.

This policy covers:

- The main areas of liability under the Bribery Act 2010;
- The responsibilities of employees and associated persons acting for, or on behalf of, the Company; and
- The consequences of any breaches of this policy.

The Bribery Act 2010

The Company is committed to complying with the Bribery Act 2010 in its business activities. Under the Act, a bribe is a financial or other type of advantage offered or requested with the:

- Intention of inducing or rewarding improper performance of a function or activity; or
- Knowledge or belief that accepting such a reward would constitute improper performance of such a function or activity.

A relevant function or activity includes public, state, or business activities or any activity performed in the course of a person's employment or on behalf of another company or individual, where the

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person performing that activity is expected to do so in good faith, impartially, or in accordance with a position of trust.

A criminal offence will be committed under the Bribery Act 2010 if:

- An employee or associated person acting for, or on behalf of, the Company offers, promises, gives, requests, receives, or agrees to receive bribes; or
- An employee or associated person acting for, or on behalf of, the Company offers, promises, or gives a bribe to a foreign public official with the intention of influencing that official in the performance of their duties (where local law does not permit or require such influence); and
- The Company does not have adequate procedures in place to prevent bribery by its employees or associated persons.

All employees and associated persons are required to comply with this policy, in accordance with the Bribery Act 2010.

Reporting Suspected Bribery

The Company depends on its employees and associated persons to ensure that the highest standards of ethical conduct are maintained in all its business dealings. Employees and associated persons are encouraged to report any concerns to the Compliance Officer as soon as possible.

Issues that should be reported include:

- Any suspected or actual attempts at bribery;
- Concerns that other employees or associated persons may be receiving or giving bribes; or
- Concerns that employees or associated persons may be bribing third parties, such as clients or government officials.

Employees can report incidents using a confidential reporting form available on request. Any such reports will be thoroughly and promptly investigated by the Compliance Officer in the strictest confidence. Employees and associated persons will be required to assist in any investigation.

Employees or associated persons who report instances of bribery in good faith will be supported by the Company. The Company will ensure that the individual is not subjected to detrimental treatment as a consequence of their report. Any instances of detrimental treatment by a fellow employee because an employee has made a report will be treated as a disciplinary offence. An instruction to cover up wrongdoing is itself a disciplinary offence. If told not to raise or pursue a concern, even by a person in authority, employees and associated persons should not agree to remain silent but should report the matter to a Company Director.

Action by the Company

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The Company will fully investigate any instances of alleged or suspected bribery. Employees suspected of bribery may be suspended from their duties while the investigation is carried out. The Company will invoke its disciplinary procedures where any employee is suspected of bribery. Proven allegations may result in a finding of gross misconduct and immediate dismissal.

The Company may terminate the contracts of any associated persons, including consultants or other workers who act for, or on behalf of, the Company, who are found to have breached this policy.

The Company may also report any matter to the relevant authorities, including the Director of Public Prosecutions, Serious Fraud Office, Revenue and Customs Prosecutions Office, and the police. The Company will provide all necessary assistance to the relevant authorities in any subsequent prosecution.

Monitoring, Training, and Review

To ensure compliance with this policy, the Company will:

- Provide mandatory training on anti-bribery laws and responsibilities to all employees and associated persons;
- Periodically review and update this policy to reflect changes in the law and best practices; and
- Conduct regular risk assessments of its operations to identify and mitigate bribery risks.

Employees and associated persons are required to participate in anti-bribery training and ensure they understand their responsibilities under this policy.

Contact Information

For further information or to report a concern, please contact the Health & Safety Manager or a Company Director. Contact details can be obtained from the HR Department.

Andy Ridout



Managing Director

January 2026

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