

Benoil Services Limited

Anti-Bribery Policy

1. INTRODUCTION

- 1.1 Benoil Services Limited (“Benoil”) and its affiliates together (“the Company”) are committed to the practice of responsible corporate behaviour and to complying with all laws, regulations and other requirements which govern the conduct of our operations.
- 1.2 The Company is fully committed to instilling a strong anti-corruption culture and are fully committed to compliance with all anti-bribery and anti-corruption legislation including, but not limited to, the Bribery Act 2010 (“the Act”) and ensures that no bribes or other corrupt payments, inducements or similar are made, offered, sought or obtained by us or anyone working on our behalf.
- 1.3 This policy has been approved by the Board and has been communicated to everyone involved in our businesses to ensure that all our staff are fully committed to its implementation.

2. BRIBERY

- 2.1 Bribery is defined as the giving or promising of a financial or other advantage to a party where that advantage is intended to induce a party to perform a particular function improperly, to reward them for the same, or where the acceptance of that advantage is in itself improper conduct.
- 2.2 Bribery is also deemed to take place if any party requests or agrees to receive a financial or other advantage from another party where that advantage is intended to induce the performance of a particular function improperly, where the acceptance of that advantage is in itself improper conduct, or where a party acts improperly in anticipation of such advantage.
- 2.3 Bribery of a foreign official is defined as the giving or promising of a financial or other advantage which is intended to influence the official in order to obtain business or an advantage in the conduct of business unless the foreign official is required or permitted by law to be influenced by such advantage.

3. CONSEQUENCES OF BRIBERY

- 3.1 Anyone or any organisation found guilty of bribery under the Act may face fines and/or prison terms. In addition, high legal costs and adverse publicity are likely to result from any breach of the Act.
- 3.2 For employees of the Company, failure to comply with this Policy and/or with the Act may result in:

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- 3.2.1 disciplinary action which may include dismissal; and
- 3.2.2 criminal penalties under the Act which may result in a fine and/or imprisonment for up to 10 years.
- 3.3 For the Company, any breach of this Policy by any employee or business associate may result in:
 - 3.3.1 the Company being deemed to be in breach of the Act;
 - 3.3.2 the Company being subject to fines; and
 - 3.3.3 the Company suffering negative publicity and further associated damage as a result of such breach.

4. RESPONSIBILITY FOR COMPLIANCE AND SCOPE OF POLICY

- 4.1 It is the responsibility of Company staff to ensure that bribery is prevented, detected and reported and all such reports should be made in accordance with the Company's Whistleblowing Policy or as otherwise stated in this Policy, as appropriate.
- 4.2 No member of staff may:
 - 4.2.1 give or promise any financial or other advantage to another party (or use a third party to do the same) on the Company's behalf where that advantage is intended to induce another party to perform a particular function improperly, to reward them for the same, or where the acceptance of that advantage will in itself constitute improper conduct;
 - 4.2.2 request or agree to receive any financial or other advantage from another party where that advantage is intended to induce the improper performance of a particular function, where the acceptance of that advantage will in itself constitute improper conduct, or where the recipient intends to act improperly in anticipation of such an advantage.
- 4.3 All staff must:
 - 4.3.1 be aware and alert at all times of all bribery risks as described in this Policy and in particular as set out in section 8 below;
 - 4.3.2 exercise due diligence at all times when dealing with third parties on behalf of the Company; and
 - 4.3.3 report any and all concerns relating to bribery to the Managing Director, or otherwise in accordance with the Company Whistleblowing Policy.
- 4.4 Any employee or any associated person (as defined by Section 8 of the Bribery

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Act 2010) found giving or receiving bribes or bribing a foreign official will face criminal charges under the provisions of the Bribery Act 2010. Anyone found guilty of bribery, will be responsible for bearing any related remedial costs such as losses, court fees or expenses.

5. FACILITATION PAYMENTS

- 5.1 A facilitation payment is defined as a payment made to officials in order to ensure or speed up the performance of routine or necessary functions.
- 5.2 Facilitation payments constitute bribes and, subject to section 5.3, may not be made at any time irrespective of prevailing business customs in certain territories.
- 5.3 Facilitation or similar payments may be made in limited circumstances where your life is in danger but under no other circumstances. Any payment so made must be reported to the Chief Executive as soon as is reasonably possible and practicable.

6. GIFTS AND HOSPITALITY

- 6.1 Gifts and hospitality remain a legitimate part of conducting business and should be provided only in compliance with the Company's Gifts and Hospitality Policy.
- 6.2 Gifts and hospitality can, when excessive, constitute a bribe and/or a conflict of interest. Care and due diligence should be exercised at all times when giving or receiving any form of gift or hospitality on behalf of the Company.
- 6.3 The following general principles apply:
 - 6.3.1 Gifts and hospitality may neither be given nor received as rewards, inducements or encouragement for preferential treatment or inappropriate or dishonest conduct.
 - 6.3.2 Neither gifts nor hospitality should be actively sought or encouraged from any party, nor should the impression be given that the award of any business, custom, contract or similar will be in any way conditional on gifts or hospitality.
 - 6.3.3 Cash should be neither given nor received as a gift under any circumstances.
 - 6.3.4 Gifts and hospitality to or from relevant parties should be generally avoided at the time of contracts being tendered or awarded.

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- 6.3.5 The value of all gifts and hospitality, whether given or received, should be proportionate to the matter to which they relate and should not be unusually high or generous when compared to prevailing practices in our industry or sector.
- 6.3.6 Certain gifts which would otherwise be in breach of this Policy and/or the Hospitality and Gifts Policy may be accepted if refusal would cause significant and/or cultural offence, however BRIGHT and DTI will donate any gifts accepted for such reasons to a charity of BRIGHT and DTI's choosing.
- 6.3.7 The Managing Director must be made aware of gifts and hospitality, whether given or received, with a value over £100. The Managing Director will make the Chairman aware of any such gifts given or received by him.
- 6.3.8 The Managing Director will record any such gifts in a Gifts & Hospitality register.

7. POLITICAL DONATIONS

- 7.1 The Company does not make political donations and the Company is not affiliated with any political party, independent candidate, or with any other organisation whose activities are primarily political.
- 7.2 Employees and other associated parties are free to make personal donations provided such payments are not purported to be made on behalf of the Company and are not made to obtain any form of advantage in any business transaction.

8. DUE DILIGENCE AND RISKS

The following issues should be considered with care in any and all transactions, dealings with officials, and other business matters concerning third parties:

- 8.1 Territorial risks, particularly the prevalence of bribery and corruption in a particular country;
- 8.2 Cross-border payments, particularly those involving territories falling under section 8.1;
- 8.3 Requests for cash payment, payment through intermediaries or other unusual methods of payment;
- 8.4 Activities requiring the Company and / or any associated party to obtain

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permits or other forms of official authorisation;

8.5 Transactions involving the import or export of goods.

9. EMPLOYMENT PROVISIONS

9.1 Contracts of employment for all new employees at the Company should include a provision requiring them to comply with the provisions of this policy.

9.2 The provision shall state that breach of this policy is a disciplinary offence which could result in summary dismissal on the grounds of gross misconduct.

10. AUDIT, REVIEW AND UPDATE

10.1 The Board will review the Anti-Bribery Policy and check that it is being adhered to at least every 12 months.

This policy has been approved & authorised by:

Name: Matt Anstead

Position: Managing Director

Date: 5th December 2025

Signature:

