Halo Benefits

POLICY

Anti-Bribery & Corruption Policy

Establishes zero-tolerance rules against bribery, corruption and improper gifts or hospitality.

UPDATED	VERSION	NEXT REVIEW
18 November 2026	1.0	November 2027

Halo Benefits Ltd · Owner: Dionne Clarke, Head of People & Partnerships · Classification: Internal & Public

Document control

Policy owner	Dionne Clarke, Head of People & Partnerships
Approved by	Board of Directors
Date approved	18th November 2026
Next Review Date	18th November 2027
Review frequency	Annually
Applies to	All employees, contractors and third parties acting on behalf of Halo Benefits Ltd
Related policies	Code of Conduct, Whistleblowing Policy

Version history

Version	Date	Summary of changes	Author
1.0	18 Nov 2026	First issue	Dionne Clarke

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1. Purpose of the policy

Halo Benefits Ltd conducts all business honestly, transparently, and with integrity. We operate a strict **zero-tolerance approach** to bribery and corruption in every form.

This policy sets out the standards we uphold and the proportionate procedures we maintain to prevent bribery, in full compliance with the **UK Bribery Act 2010** (including Section 7 and Ministry of Justice guidance on adequate procedures). As a growing workplace benefits technology company, our controls are designed to be clear, practical, and proportionate to our risk profile, and we review and strengthen them as we scale.

2. Scope

This policy applies to **Halo Benefits Ltd** and to all directors, employees, contractors, consultants, agents, introducers, and third parties performing services for or on behalf of the company (*"associated persons"*). It applies across all operations and commercial relationships, whether in the United Kingdom or internationally.

3. Legal framework

Under the **UK Bribery Act 2010**, it is a criminal offence to:

- Offer, promise, or give a financial or other advantage to induce or reward improper performance;
- Request, agree to receive, or accept a bribe;
- Bribe a foreign public official to obtain or retain business or a business advantage; or
- Fail, as a commercial organisation, to prevent bribery committed by an associated person on its behalf.

Where international client or partner engagements involve a United States nexus, our standards also align with the principles of the **US Foreign Corrupt Practices Act 1977 (FCPA)**.

4. Policy statement

No director, employee, or associated person may directly or indirectly:

- **Offer or Accept Bribes:** Offer, promise, give, request, or accept any payment, kickback, gift, hospitality, or advantage intended to improperly influence a business or procurement decision;

- **Use Cash Equivalents as Gifts:** Give or accept cash, gift cards, shopping vouchers, or cryptocurrency in connection with business dealings;
- **Make Facilitation Payments:** Pay unofficial "grease" or facilitation fees to speed up routine administrative or government actions (prohibited in all circumstances unless an individual faces an immediate threat to personal safety, which must be reported to a Director immediately);
- **Act Through Intermediaries:** Use a third party, family member, or personal account to circumvent this policy; or
- **Falsify Records:** Create incomplete, inaccurate, or misleading accounting records to conceal any payment, expense, or benefit.

5. Gifts, hospitality & donations

Modest, bona fide business hospitality and promotional gifts are permitted only where they are reasonable, transparent, proportionate, and never intended to influence an outcome. Gifts or hospitality must **never** be offered or accepted during a live tender, RFP process, or active contract negotiation.

Value (per person, incl. VAT)	Approval & Recording Requirement
Up to £50	Permitted without formal registration, provided it is occasional, transparent and appropriate
Over £50 up to £150	Permitted: must be logged in the Gifts & Hospitality Register within five working days
Over £150	Requires prior written approval from a Director and entry in the Gifts & Hospitality Register
Any value involving a Public Official	Requires prior written approval from a Director and entry in the Gifts & Hospitality Register (cash and facilitation payments strictly prohibited)

Political & Charitable Donations: Halo Benefits Ltd makes no political donations. Charitable donations or sponsorships require prior Director approval, must only be made to registered charities or bona fide organisations, and must never be linked to securing business.

6. Third-party due diligence & financial controls

Suppliers & Partners: Before engaging intermediaries, brokers, or key suppliers, we conduct proportionate due diligence on identity, ownership, and reputation, ensure fees reflect legitimate services, and include anti-bribery obligations in our contracts.

Books & Records: All payments, expenses, and hospitality must be accurately recorded in our accounting records with supporting receipts. Expense claims are independently reviewed and approved before reimbursement.

Training & Awareness: All personnel receive this policy upon onboarding and complete annual refresher awareness training.

7. Reporting concerns & non-retaliation

Everyone working with or for Halo Benefits Ltd has a duty to report any suspected bribery, improper inducement, or breach of this policy immediately to a Director or via compliance@halobenefits.co.uk (or through our Whistleblowing procedure).

All reports are handled confidentially. No individual will ever suffer detriment, demotion, or retaliation for refusing to offer or accept a bribe, or for raising a genuine concern in good faith – even if doing so results in lost business.

8. Breaches of this policy

Any breach of this policy by an employee will be treated as gross misconduct and may result in summary dismissal. Breaches by contractors, partners, or suppliers may result in immediate contract termination and referral to law enforcement authorities.

9. Review

This policy is reviewed annually – and sooner following any material system, regulatory or incident-driven change – by the Head of People & Partnerships, with final review and approval by the Board of Directors.

> QUESTIONS ABOUT THIS POLICY?
>
> Contact Dionne Clarke at dionne@halobenefits.co.uk.