

Anti Bribery and Corruption Policy

September 2026

1. Objective

- 1.1 The Hamilton Energi Ltd is committed to the prevention, deterrence and detection of fraud, bribery and all other corrupt business practices. Hamilton Energi Ltd has zero tolerance toward such behaviour. Losses due to fraud, bribery and the like can be more than just financial in nature; they can potentially damage Harlequin Construction Solutions Ltd reputation as well. The reputation of Harlequin Construction Solutions Ltd for lawful and responsible business behaviour is of paramount importance and is one of its greatest assets.
- 1.2 This policy provides a coherent and consistent framework to enable Hamilton Energi Ltd employees to understand and implement arrangements enabling compliance. In conjunction with related policies and key documents it will also enable employees to identify and effectively manage any potential breach.
- 1.3 It is a requirement that all personnel, including permanently employed, temporary agency staff and contractors:
 - Always act honestly and with integrity and to safeguard Hamilton Energi Ltd resources for which they are responsible
 - Respect Harlequin Construction Solutions Ltd, suppliers and other parties with whom it must interact to achieve its objectives by conducting business in an ethical, lawful and professional manner.
- 1.4 The key legislation and best practice that input into this policy are:
 - UK Bribery Act 2010
 - UK Fraud Act 2006
 - UK Anti-Terrorism, Crime & Security Act 2001
 - UK Money laundering Regulations 2007

2. Scope

- 2.1 This policy applies to all employees within Harlequin Hamilton Energi Ltd.
- 2.2 Within Harlequin Construction Solutions Ltd, the responsibility to control the risks of unethical business practices occurring resides at all levels of the organisation. It does not rest solely within assurance functions, but in all business units.
- 2.3 This policy covers all personnel, including those permanently employed Hamilton Energi Solutions Ltd staff and contractors.

3. Policy Framework

- 3.1 Hamilton Energi Ltd is required to have an effective compliance program that prohibits unethical conduct, which includes but is not limited to, the following components:
 - Communications of a code of conduct to employees
 - Reporting and investigation of allegations of fraud, bribery and other corrupt practices
 - Appropriate disciplinary procedures for employees who are found to have engaged in such practices
 - Monitoring of the effectiveness of such controls.

- 3.2 Consequently, Hamilton Energi Ltd must take the appropriate steps to ensure that it and all its employees and those acting on its behalf:
- Meet all legal and regulatory requirements governing the lawful and ethical conduct of business
 - Ensure all breaches or suspected breaches of this policy are fully investigated and, if appropriate, invoke disciplinary measures and take prompt action to remedy the breach and prevent any repetition
 - Make all employees aware of their personal responsibilities and adhere strictly, always, to this policy
 - Provide information to all employees and further guidance if they have any question or uncertainty regarding these requirements
 - Provide information to all employees on the procedures available to them to report any breach or suspected breach of this policy
 - Include in agreements with third parties, appropriate clauses to ensure that persons who are acting on Harlequin Construction Solutions Ltd behalf do not engage in any illegal, improper or questionable conduct, particularly if there are factors that might increase the risk of breach of this policy
 - Prohibit employees or persons and entities acting on behalf of Harlequin Construction Solutions Ltd to receive, offer, promise, improperly influence payment, authorise payments or contract award, directly or indirectly, in return for anything of value
 - Prohibit payments including 'facilitating' or 'expediting' payments to others to secure prompt or proper performance of routine duties
 - Prohibit the use of subcontracts, purchase orders or consulting agreements either as a means of channelling payments, or otherwise rewarding such persons or their relatives or business associates
 - Ensure transactions are properly and accurately recorded.
- 3.3 The relevant laws extend to activities undertaken by others acting on Hamilton Energi behalf. Their actions can subject Hamilton Energi Ltd to liability and therefore care should be taken to ensure that contractors, agents and others who are acting on behalf of the organisation do not engage in any illegal or improper conduct.
- 3.4 Hamilton Energi Ltd is expected to take firm disciplinary action in cases of proven fraud, bribery or other corrupt practices. This will very likely be immediate termination. Furthermore, all significant cases of such practices shall be reported to the public authorities unless Managing Director approve otherwise.
- 4. Key Contacts**
- Policy Owner –Directors
- First Point of Contact for reporting suspected breach – Immediate Manager/Supervisor, Contract Director/Manager
- 5. Monitoring and Compliance**
- 5.1 The Directors will review compliance with this policy statement annually. Any changes needed to ensure its effectiveness will be implemented and communicated to all Company employees.
- 5.2 Hamilton Energi Ltd will ensure that it has the necessary arrangements in place to monitor and report compliance against defined fraud categories and against this policy on an annual basis.
- 6. Definitions**

Fraud: Intentional misrepresentation or concealment of the truth to secure something of value from another. The Fraud Act 2006 includes fraud by false representation, by failing to disclose information and by abuse of position.

Corruption: Illegal, immoral or dishonest behaviour.

Bribe: To ask or make someone do something for you, in return for payment, (for example, but not limited to), payment, gifts, money or favours

Employee: Any full or part-time director, officer, manager or employee of Hamilton Energi Ltd Plc

Ultimate responsibility for the implementing of this policy is that of the Directors, but its application is the responsibility of everyone in the organisation. It is the responsibility of Hamilton Energi Ltd to provide adequate and appropriate resources to implement this policy.

Policy sign off

Company Directors acceptance of responsibility for the policy and its implementation

As Directors of Hamilton Energi Ltd. We accept responsibility for ensuring that Hamilton Energi Ltd is managed in a manner that will provide for compliance with Hamilton Energi Ltd legal obligations and conformity with the objectives and requirements as detailed in this Policy.

Paul Hamilton

A handwritten signature in black ink, appearing to read 'Paul Hamilton', with a stylized flourish at the end.

Managing Director

Date: September 2026