GROUP POLICY

# Anti-Bribery and Corruption Policy

Issued jointly by Check-Flex Limited (UK) and Measurit Technologies Ltd (Ireland). Published June 2026 · Reviewed annually.

**The Group**

Check-Flex Limited · 71–75 Shelton Street, London, WC2H 9JQ, United Kingdom

Measurit Technologies Ltd · Craanford, Gorey, Co. Wexford, Y25 TW35, Ireland

Both entities, collectively referred to in this document as "the Group", are committed to conducting all business honestly, ethically, and in full compliance with applicable anti-bribery and corruption law.

## 1. Purpose

This policy sets out the Group's commitment to preventing bribery and corruption in all its forms. It applies to all directors, employees, and anyone acting on behalf of either entity.

Check-Flex Limited operates under the UK Bribery Act 2010, which creates offences of bribing another person, being bribed, bribing a foreign public official, and — critically for companies — failing to prevent bribery by an associated person. Measurit Technologies Ltd operates under the Irish Prevention of Corruption Acts 1889–2010 and the Criminal Justice (Corruption Offences) Act 2018. The Group applies the higher of the two standards across all its activities.

## 2. Scope

This policy applies to:

- All directors and employees of Check-Flex Limited and Measurit Technologies Ltd
- Anyone performing services for or on behalf of the Group
- All business activities in the UK, Ireland, and internationally

The Group does not use agents, distributors, or commercial intermediaries in its sales activities. Products are sold directly to water utilities, drainage authorities, and infrastructure contractors. This materially reduces the third-party bribery risk profile of the Group.

## 3. What bribery means

Bribery is the offering, promising, giving, accepting, or soliciting of an advantage — financial or otherwise — as an inducement for a person to act improperly or in breach of their duties. It does not have to involve cash. It can include gifts, hospitality, services, loans, or any other benefit.

Corruption more broadly includes fraud, abuse of position, and conflicts of interest that result in improper personal gain.

Neither entity of the Group will engage in bribery or corruption in any form, whether in dealings with public officials, private sector customers, suppliers, or any other party.

## 4. Gifts and hospitality

The Group recognises that modest, bona fide hospitality and gifts are a legitimate part of business relationship management. However, gifts and hospitality must never be used to influence a business decision improperly or create an expectation of preferential treatment.

**Acceptable**

- Buying a working lunch for a customer or supplier in connection with a legitimate business meeting, at a reasonable cost
- Providing branded promotional merchandise of modest value (pens, notebooks, lanyards, and similar items bearing the Check-Flex or Measurit brand)
- Receiving equivalent modest hospitality from customers or suppliers

**Not acceptable**

- Gifts of cash or cash equivalents (vouchers, prepaid cards) to any customer, supplier, or public official
- Hospitality that is lavish, disproportionate, or not connected to a legitimate business purpose
- Any gift or hospitality offered to influence a procurement decision, tender outcome, or regulatory matter
- Gifts or hospitality to public officials without prior approval from a director
- Any benefit offered or received in exchange for a business advantage

**Limits and approval**

| Type | Limit per occasion | Approval required |
|---|---|---|
| Working lunch (given) | £50 / €60 per head | No, but record kept |
| Branded merchandise (given) | £30 / €35 per item | No |
| Any gift or hospitality to a public official | Any value | Director approval required |
| Any gift or hospitality received | Above £30 / €35 | Report to compliance contact |

Staff are encouraged to use judgement. If a gift or hospitality arrangement feels uncomfortable or could be perceived as improper, it should not proceed without prior discussion with a director.

## 5. Facilitation payments

Facilitation payments — unofficial payments made to public officials to speed up routine processes — are bribes under the UK Bribery Act regardless of their size or local custom. The Group prohibits facilitation payments absolutely. Any request for a facilitation payment must be reported to the compliance contact immediately.

## 6. Suppliers and procurement

The Group expects its suppliers to conduct their businesses ethically and in compliance with applicable anti-bribery and corruption law. Supplier agreements include a requirement to comply with applicable law. We will not knowingly do business with suppliers engaged in bribery or corruption.

Staff involved in procurement must not accept gifts, hospitality, or any other benefit from suppliers that could influence or be perceived to influence purchasing decisions.

## 7. Conflicts of interest

A conflict of interest arises where a personal interest of a director or employee could improperly influence their judgement in carrying out their duties for the Group. All actual or potential conflicts of interest must be disclosed to a director promptly. Directors must disclose conflicts to the board.

## 8. Record keeping

The Group maintains records of business lunches and hospitality given or received above the thresholds set out in section 4. Records are kept for a minimum of seven years. Accurate record keeping is itself a compliance obligation and falsification of records is a disciplinary matter.

## 9. Reporting concerns

Anyone who suspects bribery, corruption, or a breach of this policy — whether by a colleague, director, supplier, or customer — is encouraged to report it promptly. Reports will be treated confidentially and investigated without retaliation against the person reporting in good faith.

**Check-Flex Limited:** privacy@check-flex.co.uk

**Measurit Technologies Ltd:** privacy@measurit.com

Concerns may also be reported externally. In the UK, suspected bribery can be reported to Action Fraud at actionfraud.police.uk or to the Serious Fraud Office at sfo.gov.uk. In Ireland, concerns can be reported to An Gardaí Síochána.

## 10. Consequences of breach

Breach of this policy is a serious matter. For employees, it may result in disciplinary action up to and including dismissal. For the Group itself, breaches of the Bribery Act 2010 or equivalent Irish legislation can result in unlimited fines and imprisonment of individuals involved. Reputational damage and loss of contracts with regulated utility customers are further consequences the Group takes seriously.

## 11. Review

This policy is reviewed annually by the directors of both entities and updated as necessary to reflect changes in law, business activities, or risk profile. All staff are expected to familiarise themselves with this policy and raise any questions with a director.

## 12. Approval

This policy has been approved by the directors of Check-Flex Limited and Measurit Technologies Ltd.

**Approved on behalf of the Check-Flex / Measurit Technologies Group**

*Mark Radford*

**Name:** Mark Radford
**Position:** Director, Check-Flex Limited
**Date:** June 2026

*Mark Radford*

**Name:** Mark Radford
**Position:** Director, Measurit Technologies Ltd
**Date:** June 2026