



SIMPLICITYHUB LTD

ANTI-BRIBERY & ANTI-CORRUPTION POLICY

Effective date: 10 March 2026 • Review date: 10 March 2027

1. Purpose and scope

This policy sets out SimplicityHub Ltd's commitment to preventing bribery and corruption and applies to the company's owner/director and, where relevant, suppliers, contractors, freelancers, service providers and other business partners. It is proportionate to the size and nature of SimplicityHub Ltd as an owner-operated online education and digital products business.

2. Zero-tolerance commitment

SimplicityHub Ltd has a zero-tolerance approach to bribery and corruption. The company will not offer, promise, give, request, agree to receive or accept a bribe or other improper advantage in order to influence a business decision or obtain an improper benefit. The company expects all business dealings to be conducted honestly, transparently and lawfully.

3. What is bribery and corruption?

Bribery includes offering, promising, giving, requesting or accepting a financial or other advantage where the purpose is to influence improper conduct or obtain an improper business advantage. Corruption is broader and can include dishonest or improper conduct involving the abuse of entrusted power or position for private or business gain.

4. Gifts and hospitality

Reasonable and proportionate business hospitality may be acceptable where it is lawful, transparent and genuinely connected with a legitimate business purpose. Gifts, hospitality, discounts, entertainment or other benefits must not be offered or accepted where they are intended, or could reasonably appear, to improperly influence a decision. Particular care should be taken where a public official or procurement decision-maker is involved.

5. Facilitation payments

SimplicityHub Ltd does not make or permit unofficial payments intended to speed up or secure a routine governmental or administrative action. Any demand for such a payment should be declined where it is safe and lawful to do so and reported to the owner/director.

6. Conflicts of interest

Actual or potential conflicts of interest should be identified and managed transparently. The owner/director will consider whether a personal, financial or other interest could improperly influence a business decision and will take appropriate steps to avoid or manage the conflict.

7. Suppliers and third parties

Suppliers and other third parties are expected to conduct business ethically and in compliance with applicable anti-bribery and anti-corruption laws. Where proportionate to the relationship and risk, SimplicityHub Ltd may consider a supplier's reputation, ownership, business practices and relevant contractual commitments before or during engagement.

8. Payments and financial records

Business payments and expenses should be legitimate, accurately described and supported by appropriate records. SimplicityHub Ltd will not knowingly create, maintain or use false, misleading or incomplete records for the purpose of concealing an improper payment or benefit.



9. Political and charitable contributions

Company funds must not be used to make political contributions or charitable donations for the purpose of obtaining an improper business advantage. Any legitimate charitable support must be transparent and appropriately recorded.

10. Reporting concerns

Any suspected or actual bribery, corruption, improper payment, request for a facilitation payment or serious conflict of interest should be raised promptly with the owner/director of SimplicityHub Ltd. Concerns will be considered and appropriate action may include further investigation, ending a business relationship, correcting records or reporting the matter to the relevant authorities.

11. Protection from retaliation

SimplicityHub Ltd will not knowingly penalise a person for raising a genuine concern in good faith about bribery or corruption. Confidentiality will be respected as far as reasonably practicable, subject to legal and safety requirements.

12. Responsibility and proportionate controls

Overall responsibility for this policy rests with the owner/director. As a one-person company, SimplicityHub Ltd does not operate a separate internal compliance department. Anti-bribery and anti-corruption controls are therefore managed directly by the owner/director, with additional professional advice obtained where appropriate.

13. Training and awareness

The owner/director will maintain awareness of the requirements of this policy and applicable anti-bribery law. Where the business engages employees, contractors or other personnel for whom formal training is appropriate, relevant anti-bribery expectations will be communicated.

14. Breaches

A breach of this policy may result in termination of a supplier or business relationship and, where appropriate, referral to relevant authorities. The company will take proportionate action based on the circumstances and applicable law.

15. Review and approval

This policy takes effect on 10 March 2026 and will be reviewed at least annually, or sooner if there is a material change to the business, its suppliers, relevant legislation or risk profile. Next scheduled review: 10 March 2027.

Approval

Approved by: Owner / Director, SimplicityHub Ltd

Date: 10 March 2026