

Anti-Bribery & Corruption Policy

Purpose:

The purpose of this Anti-Bribery & Corruption Policy is to:

- Ensure MyCena Limited (the “Company”) and its employees operate with integrity and comply with the UK Bribery Act 2010.
- Prevent bribery, corruption, and unethical conduct in all business dealings.
- Protect the Company’s reputation and maintain trust with clients, partners, and regulators.

Scope:

- **Bribery:** Offering, promising, giving, requesting, or accepting any financial or other advantage to influence a person improperly.
- **Facilitation payments:** Small payments to expedite routine government actions (prohibited under UK law).
- **Gifts and hospitality:** Offering or accepting gifts, hospitality, or entertainment that could create a conflict of interest or undue influence.
- **Third-party interactions:** Relationships with suppliers, vendors, agents, and partners where bribery or corruption could occur.

This policy applies to all employees, contractors, consultants, officers, and directors of the Company globally.

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1. Company has zero tolerance for bribery or corruption. All employees and associated persons must act honestly and ethically in all business dealings.
 2. Compliance with Law: All employees must comply with the UK Bribery Act 2010 and any applicable anti-corruption laws in jurisdictions where the Company operates.
 3. Gifts and Hospitality:
 - Permissible gifts or hospitality must be reasonable, proportionate, and not intended to influence business decisions.
 - All gifts above £50 in value must be pre-approved by one of the executive management team and recorded in the Gifts & Hospitality Register.
 4. Facilitation Payments: Facilitation payments are strictly prohibited, regardless of local customs.
 5. Third-Party Due Diligence:

- Third parties (agents, consultants, vendors, resellers) must be screened for bribery and corruption risk before engagement.
 - Contracts must include anti-bribery clauses.
6. Record-Keeping:
- All payments, gifts, or hospitality must be documented and auditable.
 - False or misleading records are strictly prohibited.
7. Roles & Responsibilities
- Board & Executive Management: Ensure the policy is implemented and embedded into corporate culture, monitor compliance, conduct risk assessments, and provide training.
 - Employees: Must read, understand, and comply with this policy; report any suspected breaches.
8. Reporting and Whistleblowing
- Any employee or third party who suspects bribery or corruption must report it immediately via:
 - Email: [email address]
 - No retaliation will occur against anyone reporting concerns in good faith.
9. Training and Awareness: All employees will receive regular anti-bribery training as part of onboarding and annual refreshers.
10. Monitoring and Review
- Compliance with this policy will be regularly monitored
 - This policy will be reviewed annually or as needed to reflect changes in law, business practices, or regulatory guidance.
11. Consequences of Breach
- Breaches of this policy may result in disciplinary action, up to and including termination of employment.
 - Individuals may also face civil or criminal penalties under the UK Bribery Act or other applicable laws.

Version: 1.2

Date: June 2026