

SDX Motors is unwavering in its commitment to high ethical standards. Our comprehensive Anti-Bribery and Corruption / Anti-Money Laundering (Fraud & Financial Crime) Policy is designed to identify and mitigate risks associated with bribery, corruption, and money laundering. We strive to protect the interests of the company, its employees, shareholders, and customers.

Policy Scope:

This policy covers all aspects related to anti-bribery and corruption, money laundering, and fraud prevention. It establishes Board-approved governing policies, principles, and standards, along with appropriate controls to safeguard the company against the identified risks.

Policy Objectives:

Preventing Money Laundering:

SDX Motors is committed to mitigating money laundering risks, as identified by the Financial Conduct Authority (FCA). We establish and implement Board-approved policies and controls to protect the Company and stakeholders from money laundering.

Anti-Bribery and Corruption Policy:

Policy Statement:

SDX Motors is dedicated to conducting business ethically and honestly. Our commitment to professionalism, fairness, and integrity is unwavering. We maintain a zero-tolerance stance towards bribery and corrupt activities, ensuring compliance with all anti-bribery and corruption laws, including the UK Bribery Act 2010.

Policy Coverage:

This policy applies to all individuals associated with SDX Motors, including employees (temporary, fixed-term, or permanent), consultants, contractors, trainees, seconded staff, home workers, casual workers, agency staff, volunteers, interns, agents, sponsors, and any third parties or subsidiaries.

Definition of Bribery:

Bribery encompasses the act of offering, giving, promising, asking, agreeing, receiving, accepting, or soliciting something of value to induce or influence an action or decision. It includes any inducement, reward, or

object/item of value offered to gain commercial, contractual, regulatory, or personal advantage.

Acceptable and Unacceptable Practices:

Gifts and Hospitality:

Gifts and hospitality are accepted if they comply with local laws, are not intended to influence business decisions, and are given/received openly. Gifts should be of appropriate type, value, and given at an appropriate time.

Cash or cash equivalents are not acceptable.

Approval from the compliance manager is required for gifts to government officials or politicians.

Facilitation Payments and Kickbacks:

SDX Motors prohibits facilitation payments and kickbacks in any form.

Political Contributions:

The company does not make donations to support any political parties or candidates.

Charitable Contributions:

Charitable donations are encouraged but must be legal and ethical.

Approval from the compliance manager is required.

Employees' Responsibility:

All employees are responsible for understanding and complying with this policy. Prevention, detection, and reporting of bribery and corruption are shared responsibilities. Any activities that could imply a breach of this policy must be avoided.

Raising a Concern:

Employees are encouraged to raise concerns about bribery or corrupt activities at an early stage. Whistleblowing procedures are in place to ensure swift and confidential reporting. The company supports employees who report concerns in good faith.

Protection:

SDX Motors guarantees protection against detrimental treatment for those who refuse to accept or offer bribes, report concerns, or

participate in good faith in investigations. Any unjust treatment should be reported immediately to line managers or the compliance manager.

Record Keeping:

The company maintains detailed and accurate financial records, including records of hospitality, gifts, and charitable contributions. These records serve as evidence for all payments made and are subject to managerial review.

This policy reflects our commitment to ethical conduct and compliance with anti-bribery and corruption laws. It serves as a guide for employees, ensuring a collective effort to prevent, detect, and address bribery and corruption within SDX Motors.