

Ethical Business Practice

Anti Bribery & Corruption

cfes Ltd. | October 2025



Our Commitment

cfes Ltd is committed to conducting all business in an honest, ethical, and transparent manner. We uphold the highest standards of integrity in all our dealings, wherever we operate.

Zero Tolerance Approach

We take a zero-tolerance approach to bribery and corruption. We are committed to acting professionally, fairly, and with integrity, and to implementing effective systems to prevent unethical conduct.

Governance and Oversight

Our Board of Directors is responsible for monitoring compliance with this policy. The leadership team reviews and manages bribery and corruption risks through annual business risk assessments and integrates these into our standard governance and operational processes.

Training and Awareness

All employees receive annual training on ethical business practices and anti-bribery measures to ensure they understand their responsibilities and the standards expected of them.

Scope of Application

This policy applies to all employees at all levels, as well as consultants, contractors, sub-contractors, and any third parties acting on behalf of cfes Ltd.regularly to align with evolving standards and risks.

Third Party Standards

Due diligence is carried out on all third parties before engagement to ensure they meet the ethical, legal, and professional standards expected by cfes Ltd. Ongoing monitoring is conducted to ensure continued compliance.

Prohibited Practices

We do not make or accept facilitation payments or “kickbacks” of any kind. Employees must avoid any activity that could suggest such payments will be made or accepted.

Gifts and Hospitality

Promotional gifts of low value and appropriate hospitality are permitted, provided they are not intended to influence business decisions. If in doubt, employees must seek guidance from a director.

Political and Charitable Contributions

cfes Ltd does not make contributions to political parties. Charitable donations must be transparent and must not be made with the intent of gaining commercial advantage.

Financial Record Keeping

Accurate and complete records of financial transactions and expenses must be maintained, with clear documentation of the purpose and justification for each entry.

Reporting and Whistleblowing

Employees are encouraged to report suspected malpractice promptly. No employee will suffer any.

Lobbying and Influence

We do not engage in lobbying activities intended to improperly influence legislation, regulation, or public policy. Any engagement with public officials must be lawful, transparent, and aligned with our ethical standards.

.

.

Reporting and Whistleblowing

Employees are encouraged to report suspected malpractice promptly. No employee will suffer any detriment for raising genuine concerns, even if they prove to be mistaken.

Policy Review

This policy is reviewed annually and updated as necessary to ensure it remains relevant, effective and aligned with current legal and operational standards.

..

Signed	Name	Robert Doubtfire
	Position	Managing Director
	Date	Dec 2024