

12 June 2023

Ace High Drone Specialists Limited ANTI - BRIBERY AND CORRUPTION POLICY

1. Introduction
The Corporate and Social Responsibility Policy Statement of Ace High Drone Specialists sets out its general commitment and approach to such matters and a summary of the general principles informing the operational and management systems and policies of the company in the conduct of its business. As an extension to the C&SR Policy Statement this document elaborates the policy of Ace High Drone Specialists in so far as it relates to the prevention of bribery and corruption.

2. Legislative Context and Scope of Policy
The Bribery Act 2010 came into force on 1st July 2011 and requires companies to establish adequate procedures to prevent bribery and corruption. The Act contains four key criminal offences: • bribery of another person (section 1) • accepting a bribe (section 2) • bribing a foreign official (section 6) • a corporate offence of failing to prevent bribery (section 7) Bribery by individuals is punishable by imprisonment and/or an unlimited fine. If a company is found to have taken part in the bribery or is found to lack adequate procedures to prevent bribery, it too could face prosecution and an unlimited fine. Conviction for a bribery or corruption related offence would have severe reputational and/or financial consequences for the company. Within this context this policy document sets out the approach of Ace High Drone Specialists to prevent bribery and corruption and the responsibilities which shall apply to all directors, employees, agents, consultants, contractors and to any other people or bodies associated with Ace High Drone Specialists, in connection with all aspects of its business activities.

3. Understanding Bribery and Corruption
Acts of bribery or corruption are designed to influence an individual in the performance of their duty and to induce the individual to act in a way that a reasonable person would consider to be dishonest in the circumstances. Bribery can be defined as the offering, promising or giving of a financial (or other) advantage to another person with the intention of inducing or rewarding that person to act or for having acted in a way to influence a business outcome which a reasonable person would consider improper conduct in the circumstances.

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Corruption is any form of abuse of entrusted power for private gain. This and may include, but is not limited to, bribery. Bribes are not always a matter of handing over cash. Gifts, favours, hospitality and entertainment can be bribes if offered improperly and intended to influence a decision. Bribery and corruption can be direct or indirect through third parties, such as agents, brokers, joint venture parties. Facilitation payments are bribes, even if in certain countries they are intended or accepted practice.

4. Policy
Ace High Drone Specialists will not tolerate bribery or corruption in any form and requires compliance with all UK and any other prevailing and applicable anti-bribery and corruption laws. Without limiting the generality of the foregoing: (a) The company prohibits the offering, giving, solicitation or the acceptance of any bribe or corrupt inducement, whether in cash or in any other form: • to or from any person or



company wherever located, whether a public official or public body, or a private person or company; • by any individual employee, director, agent, consultant, contractor or other person or body acting on the company's behalf; • in order to gain any commercial, contractual, or regulatory advantage for the firm in any way which is unethical or to gain any personal advantage, pecuniary or otherwise, for the individual or anyone connected with the individual. (b) This policy is not intended to prohibit the following practices provided they are appropriate, proportionate and are properly recorded: • normal hospitality, provided that it complies with the company's Corporate Entertainment Policy; • an official fast tracking process which is generally available to all on the payment of a fee and subject to an official receipt; and/or • providing resources to assist a person or body to make a decision more efficiently, provided that it is for this purpose only. The company will investigate any actual or suspected breach of this policy or the spirit of this policy and reserves its position to take appropriate action in the circumstances. So far as employees are concerned, in addition to possibility of legal proceedings and penalties as a consequence of conviction, employees found to be in breach of this policy may be subject to disciplinary action, which may ultimately result in their dismissal. 221110 Ace High Drone Specialists – Anti B&C Policy Page 3 of 5 5. Procedures Ace High Drone Specialists is committed to the implementation of a robust and effective anti-bribery and corruption policy based upon procedures that are flexible and outcome focused, and appropriate to the nature, development and requirements of its business activities. Consistent with good practice and to demonstrate adequacy of procedures in the UK legislative context, procedures are based upon the following principles: • Top Level Commitment The top-level management (represented by its board of directors and senior managers from time to time) are committed to preventing bribery by persons associated with the company and promote a culture in which bribery is never acceptable. • Proportionate Procedures Procedures to prevent bribery by persons associated with the company are proportionate to the bribery risks it faces and to the nature, scale and complexity of the company's activities. Procedures are clear, practical, accessible, effectively implemented and enforced. • Risk Assessment Ongoing assessment is undertaken by the company of the nature and extent of its exposure to potential external and internal risks of bribery on its behalf by persons associated with it so as to inform the priorities and development of its anti-bribery and corruption policy and its implementation. • Due Diligence A proportionate and risk based approach will be applied in respect due diligence on parties with which business is undertaken and/or which perform services for or on behalf of the company, in order to identify and mitigate any bribery risks. • Communication (including Training) Policy and procedure are embedded and understood throughout the company through internal communication, and includes training that is proportionate to the risks that the company faces and tailored to individual employee roles. External parties associated with the company are made aware of our standards and expectations. • Monitoring and Review Procedures are reviewed and monitored in order to evaluate effectiveness and are improved, where necessary, to prevent bribery by persons associated with the company. 221110 Ace High Drone Specialists – Anti



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B&C Policy Page 4 of 5 6. Key Areas of Risk Bribery and corruption risk to the company can occur in a number of ways, including the following key areas in particular: Gifts, Hospitality and Entertainment The provision of excessive gifts, hospitality and entertainment can be used to exert improper influence on decision makers. The company will ensure that the provision and receipt of such favours and tokens are reasonable, infrequent and proportionate to the business activities and sector in which it operates by the application of a policy relating to such matters. Facilitation Payments These payments are also called “facilitating”, “speed” or “grease” payments and are used to secure or expedite the performance of a routine or necessary action to which the payer has a legal or other entitlement as of right. Such payments may be a common practice in certain countries and as such may place employees in a difficult position. Fundamentally such payments are no more than bribes and therefore are not tolerated by the company. However employees and persons acting for and on behalf of the company may be supported by the company if they have doubts concerning the nature of any payment demand and suspect it to be a facilitation payment provided that they have complied with specific company guidance relating to the resistance of such payments in such circumstances, which include payment only after attempts to exhaust an alternative outcome and demonstrating reasonable resistance without placing the individual in threat of physical harm and safety. Reciprocal Agreements/Charitable Donations Reciprocal Agreements or any other form of ‘quid pro quo’ arrangements are never acceptable unless they are legitimate business arrangements and any Charitable Donations must be legitimate and the decision to allocate company resource must be consistent with the stated policy of the company for community support and corporate social responsibility prevailing at the time. Improper payments of the foregoing type to obtain new business, retain existing business or secure any improper advantage should never be accepted. The company will ensure the application of a policy so that any such arrangements are properly documented and approved by management. Third Party Actions The appointment by the company of third parties acting on its behalf, such as agents, representatives, consultants or sub-contractors, has the potential to lead to or conceal corrupt practices particularly in countries where culture and practices may differ from the UK. The company will ensure the application of policies in this respect to ensure appropriate due diligence is undertaken before such a third party is engaged, third parties are engaged only where there is a clear business rationale for doing so and with an appropriate contract, and that any payments to third parties are properly authorised and recorded. 221110 Ace High Drone Specialists – Anti B&C Policy Page 5 of 5 Record Keeping Expenses payments are a common method of obtaining cash for bribes, company property generally can be misused to facilitate bribery and corruption and company records can be falsified and exploited to conceal such practices. Acts of such dishonesty are not tolerated by the company and will result in appropriate disciplinary action The company will ensure the application of an appropriate policy relating to such matters so that robust controls are in place and records are accurate and transparent. 7. Responsibility, Reporting and Guidance Ace High Drone Specialists is committed to the promotion of a culture which promotes the



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prevention, detection and reporting of bribery or corruption. This commitment as elaborated in this policy document depends upon the support of its directors, employees, agents, consultants and other parties acting for or on its behalf. In the event any such a party becomes aware or suspects that an activity or conduct which is proposed or has taken place may be considered unethical and dishonest and/or is a bribe or corrupt, then Ace High Drone Specialists places a duty on such party to report same to it. Such acts or conduct may include criminal acts or any other acts which could harm the reputation and standing of the company generally or of individuals working for or with it. So far as employees of the company are concerned the reporting of such Instances should be made in accordance with the separate company procedures for such matters, which provides for certain protection to the individual making such a report, including, if required, anonymity. It is accepted that it may not always be a simple matter to determine whether or not such a possible course of action is appropriate and whether a possible act or conduct might be in breach of this policy or any applicable law. In such circumstances the matter should be referred to management for guidance. This Anti-Bribery and Corruption policy document is made available to all employees, customers, and other interested parties and is publicly available on the company's web site.



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