

Anti-Bribery Policy

Policy statement

Two Hat Software Ltd does not tolerate bribery or corruption in any form. We are committed to acting professionally, fairly and with integrity in all our business dealings, wherever we work. We comply with the Bribery Act 2010.

Scope

This policy applies to the company's director, to any employees we may take on, and to any substitutes, subcontractors and agents acting on our behalf.

What is not allowed

We will never:

- offer, promise or give a bribe, or any other improper advantage, to anyone, to win or keep business or to influence a decision
- ask for, agree to receive or accept a bribe
- bribe a public official, in the United Kingdom or elsewhere
- make facilitation payments, which are small unofficial payments to speed up routine official actions
- use a third party to do any of these things on our behalf

Gifts and hospitality

Modest gifts and hospitality can be a normal part of business relationships. They are acceptable only if they are:

- reasonable in value and appropriate to the occasion
- given or received openly, not secretly
- not intended, and not likely to be seen, as a way of influencing a business decision
- allowed under the other party's own policies

We will not give or accept gifts or hospitality while a tender or contract decision involving that party is being made. We never give or accept cash, or cash equivalents such as vouchers.

We record any gift or hospitality given or received with a value of more than £50 in a register, which the director keeps.

Political and charitable donations

We do not make political donations. Any charitable donation is made openly, and never as a way of obtaining a business advantage.

Third parties

We expect our suppliers and subcontractors to meet the standards in this policy when they act for us. We will not engage, or will stop working with, anyone who does not.

Reporting concerns

If anyone is offered or asked for a bribe, or suspects bribery in connection with our business, they should report it to the director at admin@twohatsoftware.co.uk as soon as possible. We will not tolerate anyone being treated unfairly because they refused to take part in bribery or raised a concern in good faith.

Consequences

Bribery is a criminal offence. Any breach of this policy will lead to the end of the relevant engagement, and may be reported to the authorities.

Responsibility and review

The director, George Dennington, is responsible for this policy and for making sure it is followed. It is reviewed at least once a year.

This policy took effect on 3 October 2026.

Two Hat Software Ltd is registered in England and Wales, company number 17490460.

Registered office: Apartment 6, 89 Parade, Leamington Spa, England, CV32 4NL.

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