



FASTVIEW360

superfast video monitoring

ANTI-BRIBERY AND CORRUPTION POLICY

2026



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Statement and Purpose of Policy

As involvement in bribery and corruption exposes Fastview360 Limited ('the Business') and its employees and representatives to criminal liability, damages the Business' reputation and damages the confidence of any clients or customers, suppliers and business partners, the Business is committed to conducting its business in an honest and ethical manner.

The Business is subject to the Bribery Act 2010 and, from 1 September 2025, the failure to prevent fraud offence under the Economic Crime and Corporate Transparency Act 2023.

The Business has a zero-tolerance approach towards bribery, corruption and fraud and is committed to:

1. acting professionally, fairly and with integrity;
2. preventing bribery, corruption and fraud by persons associated with the Business;
and
3. implementing and maintaining effective, risk-based systems and controls.

What Does This Policy Cover?

This Policy covers bribery and corruption taking place anywhere in the Business (within the UK or abroad).

It applies to:

- all Staff; and
- all "associated persons", including agents, consultants, contractors, intermediaries, suppliers and any person performing services for or on behalf of the Business.

This Policy does not form part of any employment contract and the Business retains the right to amend it at any time, at its absolute discretion.

What Are Bribery and Corruption?

Bribery and Corruption

A 'bribe' is any inducement or reward that is offered, promised, requested or provided in order to gain a commercial, contractual, regulatory or personal advantage. In most cases, a bribe will be a financial or other advantage given to a person in order for them to perform a relevant function or activity improperly, or to reward them for doing so.

1. Bribes, in the form of financial or other advantages, may include:
 - money (whether in the form of cash or cash equivalent);
 - gifts;

- hospitality and entertainment;
- loans;
- services;
- preferential treatment;
- discounts; and
- promises to provide financial or other advantages in the future.

For something to be considered a bribe and be subject to this Policy:

- the timing of the bribe is irrelevant and any payments made, or advantages given, after a relevant event are considered bribes;
- the payment made, or advantage given, can be given or received unknowingly; and
- it is also not necessary for the bribed party to actually receive a benefit as a result of the bribe.

'Bribery' includes:

- giving, offering or promising a bribe;
- requesting, receiving or agreeing to receive a bribe; or
- bribing a foreign public official (as defined in the Act).

'Corruption' is the misuse of power or office for private gain.

This means that no one should:

- offer or provide a bribe (e.g. any payment, gift, hospitality or other benefit) to reward the business advantage received, or in the expectation that a business advantage will be received.
- accept a third party's offer that they know or suspect to be made with the expectation that it will provide a business advantage (to the third party or anyone else).
- offer or provide a payment to a government official in any country (in the UK or abroad) to facilitate or speed up a necessary or routine procedure.
- fail to prevent bribery and corruption from occurring.

No one must intimidate, threaten or retaliate against another person who has refused to accept or offer a bribe or who has raised concerns under this Policy.

For the purposes of this Policy, it does not matter whether:

- bribery and corruption occur in the UK or abroad. Any act of bribery or corruption committed outside of the UK may be prosecuted in the UK; or
- the act of bribery and corruption is committed directly or indirectly.

Fraud

Fraud includes dishonesty or misrepresentation intended to secure an unlawful gain or cause loss. This includes (non-exhaustively):

- false accounting or misleading financial reporting
- dishonest sales practices or misrepresentation to clients

- misuse of company funds or assets
- concealment of conflicts of interest
- obtaining services or payments dishonestly

The Business may be criminally liable where it fails to prevent fraud by an associated person.

Prohibited Conduct

In addition to existing prohibitions, no one must:

- engage in any form of fraud or dishonest conduct;
- falsify records, accounts, or documentation;
- misrepresent services, pricing or capabilities to clients;
- conceal or fail to disclose conflicts of interest;
- facilitate financial crime by third parties.

Failure to Prevent Offences

The Business may be liable where it fails to prevent bribery or fraud by associated persons.

To mitigate this risk, the Business implements reasonable and proportionate procedures, including:

- risk assessments
- due diligence on third parties
- financial and operational controls
- training and awareness
- monitoring and review

All Staff and associated persons must comply with these procedures.

Who Can Be Involved in Bribery and Corruption?

Bribery and corruption can be committed by:

- any worker of the Business, irrespective of seniority, tenure and working hours, including all employees, directors and officers, consultants and contractors, temporary and agency workers, trainees, casual and fixed-term staff, apprentices, interns and any volunteers (Staff);
- anyone otherwise authorised to act on the behalf of Staff;
- the Business' representatives and any other third parties who act on the Business' behalf;
- the Business' suppliers; and
- the Business' clients or customers (e.g. a customer may attempt to induce someone working for the Business to give that customer more favorable treatment).
- This includes any associated person, whether acting directly or indirectly and regardless of geographic location.

This Policy and the rules contained within it apply to those listed in paragraph 13 above.

In What Circumstances Can Bribery and Corruption Occur?

Bribery and corruption can take place in the public and private sectors.

Typically, the person receiving the bribe can influence the progress of or be aware of relevant business due to their position. The person receiving the bribe will often, but not always, be a government or public official.

Responsibility and Governance

The Board of Directors retains overall responsibility for this Policy.

The Directors are responsible for:

- Implementation and oversight of the Policy;
- Conducting periodic risk assessments (including fraud risk);
- Ensuring adequate procedures are in place and effective;
- Reporting significant issues to the Board.

Managers must:

- Ensure staff understand risks relevant to their role;
- Ensure controls are followed in practice (not just documented).

Gifts and Hospitality

All Staff are forbidden from soliciting any gifts or hospitality in the course of their work for the Business.

All Staff are forbidden from offering or receiving gifts or hospitality which are unduly lavish, extravagant or otherwise inappropriate from any person or organisation which has had, has or may have influence over the Business' business. The following is a non-exhaustive list of gifts and hospitality the Business deems inappropriate:

- Hospitality valued at more than £50.00.
- Gifts, be they personal or corporate, with a value greater than £50.00.
- Any gifts that include cash or cash equivalents (including, but not limited to, vouchers).
- Any hospitality or gifts given or received in secret.
- Any hospitality or gifts received in the name of an individual rather than the Business' name.
- All gifts and hospitality must
 - Be reasonable, proportionate and for legitimate business purposes;
 - Not create the appearance of impropriety or influence decision-making.

If you have any questions about gifts and hospitality, contact the Managing Director at wayne@fastview360.co.uk.

Third-Party Due Diligence

The Business will take a risk-based approach to third-party relationships.

Before engaging third parties, the Business may:

- assess reputation and integrity;
- identify beneficial ownership where appropriate;
- evaluate corruption and fraud risks;
- document the business rationale.

Higher-risk relationships require enhanced scrutiny and approval.

Financial Controls and Record Keeping

As transparency is crucial and false or misleading records could be damaging to the Business, it is essential that the Business keeps a full and accurate record of all financial dealings. Under relevant money laundering regulations, the Business' accountants and lawyers are required to report anything that seems irregular.

As a result, Staff must declare and properly record in writing all hospitality and gifts received or given. In relation to any hospitality, gifts or payments to third parties (including suppliers and customers), Staff must:

- submit expense claims; and
- record in writing the reason for the expenditure.

All accounts, invoices, purchase orders, credit notes and other records relating to third parties must be accurately and fully prepared in accordance with the Business' procedures, practices and requirements.

The Business will maintain effective internal controls to prevent fraud, including:

- segregation of duties where appropriate;
- approval controls for payments and contracts;
- accurate and complete record-keeping;
- prohibition of off-book accounts or undisclosed transactions.

All records must:

- accurately reflect transactions;
- be retained in accordance with legal and regulatory requirements.

Monitoring and Review

The Business will:

- regularly review risks relating to bribery, corruption and fraud;
- test the effectiveness of controls;
- update this Policy as required;

- investigate suspected breaches promptly.

Training

All Staff will receive appropriate training on:

- bribery, corruption and fraud risks;
- this Policy and associated procedures;
- how to identify and report concerns.

Training will be proportionate to role and risk exposure.

Reporting Concerns

All Staff have a responsibility to comply with this Policy and prevent bribery and corruption. Staff who:

- witness or otherwise discover anything corrupt or otherwise improper taking place;
- are offered a bribe;
- are asked to offer a bribe; or
- suspect or discover that any bribery or corruption has taken place or may take place;

Staff must notify their manager and the Legal Department as soon as possible. Staff can do this anonymously. As Staff must report issues related to bribery and corruption as soon as possible, any delays will need to be explained.

All Staff and associated persons must report concerns promptly. Reports may be made:

- to management;
- via confidential or anonymous channels where available.

The Business:

- encourages speaking up;
- will not tolerate retaliation;
- will investigate all credible concerns.

Whistleblowing Protection

No individual will suffer detriment for raising a genuine concern in good faith, even if it is later unsubstantiated.

Retaliation will be treated as a serious disciplinary matter.

Consequences of Non-Compliance

The Business takes compliance with this Policy very seriously and failure to comply with this Policy puts both Staff and the Business at significant risk.

Staff who fail to comply with this Policy may commit a criminal offence and the criminal law relating to bribery and corruption carries several penalties.

Due to the importance of this Policy, failure to comply with any of its procedures and requirements may result in disciplinary action and/or dismissal for gross misconduct. Any non-Staff who breach this Policy may have their contract terminated with immediate effect.

Breaches may result in:

- Disciplinary action (including termination);
- Termination of third-party relationships;
- Civil or criminal liability for the individuals and/or the Business.

If you have any questions or concerns about anything in this Policy, please contact the Managing Director at wayne.moss@fastview360.co.uk

Signed:



Wayne Moss – Managing Director

Date: 12/05/2026

Signed:



Toby Fournier - Head of Legal

Date: 12/05/2026

Review Date – May 2027