

Anti-Bribery and Corruption Policy Statement

D R Caswell Limited trading as Caswells Group and Cutlers

A bribe is an inducement or reward offered, promised, or provided in order to improperly gain any commercial, contractual, regulatory, or personal advantage, which may constitute an offence under the Bribery Act 2010. This includes giving or offering a bribe and receiving or requesting a bribe.

Good business ethics are integral to Caswells' working practices. We are committed to acting professionally and accountably in everything that we do. Employees and those working on behalf of the organisation are committed to avoiding undue influence.

Caswells prides itself on its independence and impartiality. This means that we are committed to not seeking to influence or be influenced by payments of money or anything of value, corporate hospitality, or gifts. It is our company policy to conduct all of our business in an honest and ethical manner. We take a zero-tolerance approach to bribery and corruption and we are committed to acting fairly, transparently, and with integrity in all of our business dealings and relationships.

Our commitment is reinforced through our participation in internationally recognised responsible business initiatives. D R Caswell Limited is a member of SEDEX and is assessed by EcoVadis, both of which require strong governance, transparency, and ethical business practices. In addition, we maintain an Ethical Trading Initiative (ETI) Policy, which forms part of our anti-bribery controls and supports our wider responsibility to ensure fair labour standards, integrity in our supply chain, and compliance with international ethical trading standards.

The purpose of this Anti-Bribery and Corruption Policy is to set out our responsibilities, and those working on our behalf, in observing and upholding our zero-tolerance position on bribery and corruption.

It provides information and guidance on how to recognise and avoid bribery and corruption.

Scope and Applicability

This policy applies to all individuals working for or on behalf of D R Caswell Limited, including actual and potential clients, suppliers, distributors, business contacts, agents, advisers, government, and public bodies.

Gifts and Hospitality

This policy does not prohibit normal and appropriate gifts and hospitality (given and received) to or from third parties unless otherwise specifically stated.

Gifts and hospitality:

- We are committed to ensuring they are not made with the intention of improperly influencing a third party or employee to obtain or retain business or a business advantage, or to reward the provision or retention of business or a business advantage, or in explicit or implicit exchange for favours or benefits.
- We are committed to ensuring they are given in the name of the organisation, not in an individual's name.
- We are committed to ensuring they do not include cash or cash equivalents.
- We are committed to ensuring they are appropriate in the circumstances.
- We are committed to ensuring they are of an appropriate type and value and given at an appropriate time taking into account the reason for the gift.
- We are committed to ensuring they are given openly and not secretly.

What is Not Acceptable?

It is not acceptable for any employee, or persons working on behalf of D R Caswell Limited, to:

- Give, promise to give, or offer a payment, gift or hospitality with the expectation or hope that Caswells will improperly be given a business advantage, or as a reward for a business advantage already improperly given.
- Give, promise to give, or offer a payment, gift or hospitality to a government official, agent, or representative to facilitate or expedite a routine procedure.
- Accept payment from a third party where it is known or suspected that it is offered or given with the expectation that the third party will improperly obtain a business advantage.
- Accept a gift or hospitality from a third party where it is known or suspected that it is offered or provided with an expectation that a business advantage will be improperly provided by Caswells in return.
- Threaten or retaliate against another employee or person working on behalf of the organisation who has refused to commit a bribery offence or who has raised concerns under this policy.
- Engage in any activity that might lead to a breach of this policy.

Charitable Donations and Sponsorship

D R Caswell Limited is committed to ensuring that charitable donations and sponsorship are only made where they are legal and ethical.

Record Keeping

We are committed to keeping appropriate financial records and maintaining appropriate internal controls which evidence the business reason for gifts, hospitality, and payments made and received.

Responsibilities and Raising Concerns

The prevention, detection, and reporting of bribery and other forms of corruption are the responsibility of all those working for or on behalf of D R Caswell Limited. We are committed to ensuring that all persons working under our control avoid any activity that might lead to or suggest a breach of this policy. Employees and representatives are required to notify a member of the Management Team as soon as possible if they believe or suspect that a conflict with this policy has occurred, may occur in the future, if they are offered a bribe, are asked to make one, suspect that this may happen in the future, or believe that they are a victim of another form of unlawful activity.

Training and Communication

We are committed to ensuring that all employees are made aware of this Anti-Bribery and Corruption policy. Where necessary, information, instruction, and training will be provided to maintain responsibilities and adherence to our ethical business practices, strengthening the company and its reputation for independence, and honest dealings with all stakeholders.

Accountability

Peter Caswell, Managing Director, is responsible for ensuring the implementation of this Anti-Bribery policy and for making the necessary resources available to realise our commitments. Responsibility for delivering on this policy rests with employees at all levels within the organisation.

This policy is maintained as documented information, communicated throughout the organisation, made available to interested parties as appropriate, and reviewed at least annually to ensure its ongoing suitability, adequacy, and effectiveness. Performance against this policy is monitored through our Business Management System and management review process to ensure adherence to the Bribery Act 2010 and ensure ethical business practice, transparency, and continual improvement across our operations and supply chain.

This policy is endorsed by Paul Murphy, Commercial Director, for and on behalf of the Managing Director, who retains overall responsibility for Anti-Bribery within the organisation.



Commercial Director

Policy date: 1 September 2025

Policy re-approved: 12 September 2025

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