



Anti-Bribery and Corruption Policy

Falcon Stars Group Ltd

Owner: Managing Director

Effective: 2 October 2026

Next review: 2 October 2027

Purpose and scope

Falcon Stars Group Ltd is committed to honest business dealings. This policy applies to its director, anyone working for or representing the company, and business relationships involving customers, suppliers and intermediaries in the UK or overseas.

Our standards

We prohibit offering, requesting, accepting or arranging bribes, kickbacks and improper payments, including facilitation payments. Contracts and purchasing decisions must be based on legitimate business criteria. Nobody may use an agent, donation or personal payment to bypass these rules.

Gifts, hospitality and interests

Gifts and hospitality must be modest, lawful, transparent and appropriate to the relationship. They must not influence, or appear to influence, a tender, inspection or purchasing decision. Cash and cash-equivalent gifts are prohibited. Proposed gifts, hospitality or donations connected with company business must be referred to the Managing Director before acceptance or payment and recorded with the decision. Actual or potential conflicts of interest must be declared and managed before proceeding.

Checks and records

The Managing Director will assess bribery risks proportionately when selecting suppliers, intermediaries and markets. Services, fees and payment recipients must be clear and commercially justified. Unusual payment requests must be checked before payment. Company records must accurately describe transactions; undisclosed arrangements and false invoices are not permitted.

Raising concerns and response

Report suspected bribery promptly to adnan@falconstars.co.uk. Do not make an improper payment or investigate alone. Genuine concerns will be assessed without retaliation, with records protected and appropriate independent advice or authority involvement where needed. If a concern involves the Managing Director, an appropriate external authority or independent adviser may be approached. Breaches may lead to corrective action, termination of an arrangement or referral to authorities, as appropriate.

Document control

Supplier controls: PR-004. Related policy: Whistleblowing and Speak Up Policy.

The Managing Director will review this policy at least annually and following significant changes or relevant incidents. Initial issue: Version 1.0, 2 October 2026.

Approved on behalf of Falcon Stars Group Ltd Adnan Aslam | Managing Director | 2 October 2026