



Anti Bribery, Fraud and Corruption Policy

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Anti-Bribery, Fraud & Corruption Statement

Fury Design Agency is committed to conducting business ethically, transparently and with integrity across all aspects of our operations, procurement activities and commercial relationships.

We operate a zero-tolerance approach to bribery, fraud, corruption and unethical business conduct and are committed to complying with all applicable legislation, including the Bribery Act 2010, Fraud Act 2006 and other relevant laws relating to financial crime, ethical trading and corporate governance.

Fury is committed to:

- maintaining honest and transparent business practices,
- operating fair and ethical procurement processes,
- implementing proportionate financial controls and governance procedures,
- promoting a culture of accountability and integrity,
- encouraging the reporting of genuine concerns without fear of retaliation,
- and undertaking appropriate due diligence in relation to suppliers, subcontractors and third-party relationships.

We expect all employees, freelancers, contractors, suppliers and business partners working with or on behalf of Fury to uphold the same standards of ethical conduct and professional integrity.

This policy supports Fury's commitment to responsible business operations and continual improvement in governance and compliance practices.

Signed,

A handwritten signature in cursive script that reads "J. Shirley".

James Shirley
Managing Director



Introduction

Fury Design Agency (Fury) is committed to conducting all business activities lawfully, ethically and with integrity.

We recognise the importance of maintaining strong governance, transparent commercial practices and effective financial controls throughout our operations, procurement activities and supply chain relationships.

Fury does not tolerate bribery, fraud, corruption or any form of unethical business conduct and is committed to taking appropriate steps to prevent, identify and respond to such activity.

This policy sets out Fury's approach to anti-bribery, fraud prevention, ethical conduct and reporting responsibilities.

Scope

This policy applies to:

- all Fury employees,
- freelancers and temporary workers,
- contractors and subcontractors,
- consultants,
- agency workers,
- suppliers and service providers,
- and any third parties acting on behalf of Fury Design Agency.

All individuals and organisations associated with Fury are expected to comply with the principles and requirements set out within this policy.

Governance & Responsibility

Overall responsibility for the implementation, monitoring and review of this policy sits with the Managing Director and Senior Leadership Team.

Managers responsible for procurement, finance, project delivery and supplier engagement are expected to ensure appropriate governance, financial oversight and ethical business practices are maintained within their areas of responsibility.

Fury will:

- maintain proportionate financial and procurement controls,
- review supplier onboarding and approval procedures,
- encourage ethical and transparent business conduct,
- investigate genuine concerns appropriately,
- and review this policy periodically to support continual improvement.

All employees and individuals working on behalf of Fury are expected to act honestly, responsibly and in the best interests of the business.

Definitions



Bribery

Bribery is the offering, promising, giving, requesting or accepting of any financial or other advantage intended to induce or reward improper performance, unethical behaviour or abuse of trust.

Fraud

Fraud is any deliberate act of deception intended to secure personal, commercial or financial gain or to cause loss to another party.

Corruption

Corruption is the misuse of entrusted power, position or authority for private gain or improper advantage.

Anti-Bribery

Fury prohibits any form of bribery, whether direct or indirect.

It is prohibited for any employee or person acting on behalf of Fury to:

- offer, promise or give a bribe,
- request or accept a bribe,
- provide payments or incentives intended to improperly influence business decisions,
- or engage in any activity that could be considered unethical, dishonest or corrupt.

Bribery may involve cash payments, gifts, hospitality, favours, services, employment opportunities or any other item of value intended to influence decision-making improperly.

Fury also prohibits facilitation payments and improper payments to public officials or government representatives.

Any employee or individual acting on behalf of Fury who is offered a bribe, suspects bribery or becomes aware of unethical conduct must report the matter immediately in accordance with this policy.

Failure to comply with anti-bribery legislation may result in criminal penalties for both individuals and organisations, including fines and imprisonment.

Anti-Fraud

Fury prohibits all forms of fraud and dishonest conduct.

Fraudulent activity may be committed internally or externally and may involve employees, freelancers, contractors, suppliers or third parties.

Examples of prohibited conduct include:

- falsification of financial records, invoices, timesheets or expenses,
- manipulation of project costs, budgets or reporting,
- theft or misuse of company funds, assets or intellectual property,
- undisclosed conflicts of interest resulting in personal gain,



- dishonest supplier or procurement practices,
- knowingly providing false or misleading information,
- unauthorised financial transactions,
- or misuse of company systems, information or resources.

All individuals working on behalf of Fury are expected to:

- maintain accurate and complete records,
- follow financial approval and procurement procedures,
- act honestly and transparently,
- and declare any actual or potential conflicts of interest.

Managers are responsible for ensuring appropriate oversight, approvals and controls are maintained within their areas of responsibility.

Conflicts of Interest

Employees and individuals acting on behalf of Fury must avoid situations where personal interests conflict, or could reasonably appear to conflict, with the interests of the business.

Any actual, potential or perceived conflicts of interest must be disclosed to management as soon as reasonably practicable.

Conflicts may include:

- personal relationships with suppliers or contractors,
- financial interests in third-party organisations,
- undisclosed commissions or incentives,
- or any arrangement that could improperly influence business decisions.

Fury expects all procurement, supplier selection and commercial decisions to be made objectively, fairly and in the best interests of the business and its clients.

Procurement & Supplier Integrity

Fury is committed to fair, transparent and ethical procurement practices.

Appropriate due diligence and approval processes will be applied when engaging suppliers, subcontractors and third-party service providers.

Supplier onboarding and procurement processes may include:

- review of supplier credibility and reputation,
- verification of business legitimacy,
- consideration of ethical and compliance standards,
- financial checks where appropriate,
- and review of potential conflicts of interest.

Fury expects suppliers and subcontractors to operate ethically, lawfully and with integrity and reserves the right to cease relationships where serious unethical conduct, fraud, bribery or corruption concerns arise.



Gifts & Hospitality

Fury recognises that reasonable and proportionate business gifts and hospitality can form part of maintaining professional business relationships.

However, gifts and hospitality must never:

- improperly influence business decisions,
- create a conflict of interest,
- compromise professional judgement,
- or create the appearance of unethical conduct.

Gifts and hospitality must:

- be reasonable and proportionate,
- comply with applicable laws and client requirements,
- be transparent and appropriately recorded,
- and never be offered or accepted in exchange for business advantage.

Cash gifts or cash equivalents are strictly prohibited.

Any significant, unusual or potentially sensitive gifts or hospitality must be declared to management and approved where appropriate.

Hospitality becomes a gift where the host is not present.

Fury reserves the right to prohibit gifts or hospitality in specific circumstances, projects or client relationships where required.

Reporting Concerns

Fury encourages employees, freelancers, suppliers and stakeholders to report any concerns relating to bribery, fraud, corruption or unethical conduct.

Concerns may be raised through management channels or directly with senior leadership.

All reports will be treated seriously and investigated appropriately and confidentially wherever possible.

Fury will not tolerate retaliation, victimisation or detrimental treatment against any individual who raises genuine concerns in good faith.

Employees are also reminded of the Company's Whistleblowing Policy and reporting procedures.

Training & Awareness

Fury recognises the importance of awareness and education in maintaining ethical business practices and effective governance.

Where appropriate, Fury will:



- promote awareness of bribery, fraud and corruption risks,
- encourage responsible procurement and financial practices,
- support management understanding of governance responsibilities,
- and review opportunities for additional training and awareness initiatives over time.

Breaches of this Policy

Any breach of this policy will be treated seriously.

Where appropriate, Fury may:

- undertake formal investigations,
- implement disciplinary procedures,
- terminate contracts or supplier relationships,
- recover losses,
- and report matters to relevant authorities or law enforcement agencies.

Failure to comply with this policy may result in disciplinary action up to and including dismissal, termination of contract or legal action.

Monitoring & Review

Fury Design Agency is committed to continually reviewing and strengthening its governance, ethical trading and financial control practices.

We will:

- review this policy periodically,
- monitor relevant legislation and guidance,
- review procurement and financial control procedures,
- assess opportunities for improvement in governance and compliance,
- and update policies and procedures as the business evolves.

This policy will be communicated internally and made available to relevant stakeholders, suppliers and partners where appropriate.