

Anti-Bribery, Corruption and Fraud Policy

CEO Statement of Commitment

At Micheldever Tyre Services Limited, integrity and ethical conduct are the cornerstones of our operations. As a proud subsidiary of Sumitomo Rubber Industries, Ltd. We are unwavering in our commitment to uphold the highest standards of honesty, transparency, and accountability in all our business dealings.

We adopt a zero-tolerance approach to bribery, corruption, and fraud. These unethical practices not only undermine the trust of our stakeholders but also contravene the principles we stand for. Our policies are designed to ensure compliance with all applicable laws, including the UK Bribery Act 2010, and to foster a culture where ethical conduct is the norm.

This policy serves as a testament to our dedication to ethical business practices and aligns with the Sumitomo Rubber Industries Ltd.'s Anti-Bribery and Corruption Policy. We expect all our employees, partners, and stakeholders to embrace and uphold these standards.

A handwritten signature in blue ink that reads 'Graham Mitchell'.

Graham Mitchell

Chief Executive Officer

Micheldever Tyre Services Limited

5th September 2025

Our Aim

- To prevent bribery, corruption, and fraud across all areas of our business.
- To demonstrate our compliance with the “Failure to prevent bribery” under Section 7 of the UK Bribery Act and “Failure to prevent fraud” under Section 199 of the Economic Crime and Corporate Transparency Act 2023.
- To ensure that all external stakeholders, including suppliers, business partners, agents, and contractors, understand our expectations and standards.
- To outline our procedures for detecting, reporting, and responding to misconduct.

Our Scope

- All employees and officers of Micheldever Tyre Services Limited.
- Third parties acting on behalf of Micheldever Tyre Services Limited, including agents, consultants, intermediaries, contractors, distributors, and business partners.

Key Definitions

- **Bribery:** Offering, promising, or giving financial or other advantages to another person with the intention of inducing or rewarding them to perform a relevant function or activity improperly.
- **Corruption:** The abuse of entrusted power for private benefit, often breaching laws, regulations, or standards of integrity. This includes bribery, where financial or other advantages are offered to influence a person's behaviour.
- **Fraud:** Encompasses various ways a person can dishonestly deceive others for personal gain or to cause another loss.

Our Commitments

In alignment with the principles of the UK Bribery Act 2010, the Fraud Act 2006 and the policies of our parent company, Sumitomo Rubber Industries, Ltd., we make the following clear commitments.

Zero Tolerance

We operate a strict zero tolerance policy toward bribery, corruption, and fraud. Any breach of this policy will result in disciplinary action, including the possible dismissal or termination of contract and may be reported to regulatory authorities.

Ethical Culture and Tone from the Top

We are committed to cultivating a culture of integrity, led by Senior Management. Our leaders are expected to model ethical behaviour and foster an environment in which employees feel safe to raise concerns.

Adequate and Proportionate Procedures

We will implement and maintain adequate procedures to prevent bribery and fraud in accordance with the legislations. These procedures are proportionate to the risk we face and are regularly reviewed and updated.

Third Party Risk Management

We expect our business partners, suppliers, distributors and intermediaries to comply with our standards. All third parties are subject to proportionate due diligence, and we embed anti-bribery and anti-fraud clauses in relevant contracts.

Training and Awareness

We will provide regular and targeted training, communications, and guidance to employees, management and relevant third parties. All relevant employees receive mandatory training on anti-bribery, corruption and fraud, including guidance on handling gifts, hospitality and third party engagements. This ensures that everyone understands the risks, their responsibilities and how to respond to potential issues.

Gifts, Hospitality, and Conflicts of Interest

We have a gifts and hospitality policy that supports ethical transparent business relationships. All gifts and hospitality with a value over £50 must be declared and/or approved in accordance with the gifts and hospitality policy and recorded in the gifts and hospitality register. Under no circumstances should gifts and hospitality be offered or accepted to improperly influence a business decision.

Third Party Conduct and Due Diligence

All third parties acting on our behalf – including suppliers, consultants, agents and distributors – are expected to uphold our ethical standards. Due diligence is conducted proportionately to risk and contractual obligations include anti-bribery and anti-fraud provisions.

Reporting and Whistleblowing

We encourage open reporting through secure and confidential channels. All employees and external stakeholders can report concerns via our whistleblowing hotline: Safecall (www.safecall.co.uk/report/ or call 0800 915 1571). No retaliation will be tolerated against anyone who raises a concern in good faith.

Record Keeping and Transparency

We maintain accurate and transparent records, particularly for financial transactions, third party relationships, and gifts and hospitality. Any attempt to conceal improper activity is treated as a serious breach of this policy.

Monitoring and Continuous Improvement

The Risk Committee will review this Policy on an at least an annual basis to ensure that our controls remain effective and reflect current legal, regulatory and operational risks.

Accountability at All Levels

We believe every individual – whether employee or contractor – has a personal responsibility to act ethically. Any breach to this policy may result in disciplinary action, legal proceedings, or removal from our supplier or partner network.