



CONSIDER IT DONE.

Anti-Corruption and Anti-Bribery Policy

Controlled Document	
Issue Status:	Issued
Issue Date:	18.03.2026
Policy No:	002
Issued to: (Person/Site)	Ted Soulsby / CID Group

Review and Amendments

Below is information relating to the periodic review and amendments made to this document following its original issue.

ACTIONS UNDERTAKEN	DATE	INITIAL
CID Products LLP replaced with CID Trading Ltd	14.03.2023	SE
Reviewed	14.03.2024	SE
OB Taken over responsibility of reviewing policies from SE	05.01.2026	OB
Reviewed	20.03.2025	OB
Reviewed & Updated to 2026 gold standard	18.03.2026	OB

1. Purpose

The purpose of this policy is to outline CID Trading Limited's commitment to conducting business in an honest, ethical, and compliant manner, and to prevent bribery and corruption in all business activities.

2. Scope

This policy applies to all individuals working for or on behalf of CID Trading Limited, including:

- Directors and officers
- Employees (permanent, temporary, or contract)
- Consultants, contractors, and agency staff
- Suppliers, agents, and business partners

3. Policy Statement

CID Trading Limited operates a zero-tolerance approach to bribery and corruption.

We are committed to:

- Acting professionally, fairly, and with integrity in all business dealings
- Complying with the UK Bribery Act 2010 and all applicable laws
- Preventing bribery and corruption across our operations and supply chain

Bribery includes offering, promising, giving, requesting, or accepting anything of value to gain a business advantage.

4. Prohibited Conduct

It is strictly prohibited to:

- Offer, give, or receive bribes in any form
- Make or accept facilitation payments or "kickbacks"
- Offer gifts or hospitality intended to improperly influence decisions
- Accept gifts or hospitality where there is an expectation of favour

Gifts are only permitted where they are:

- Reasonable and proportionate
- Given openly and transparently
- Not cash or cash equivalents
- Compliant with applicable laws
- Approval must be obtained before offering or accepting anything involving government officials.

5. Third-Party and Supply Chain Compliance

CID Trading Limited expects all third parties, including suppliers, agents, and contractors, to adhere to the principles of this policy.

We are committed to:

- Conducting appropriate due diligence on third parties
- Monitoring supplier compliance where appropriate
- Taking action where breaches are identified, including termination of relationships

6. Risk-Based Approach

CID Trading Limited adopts a risk-based approach to preventing bribery and corruption.

We assess risks based on:

- Nature of business activities
- Geographic locations
- Third-party relationships

Controls and due diligence procedures are applied proportionately to the level of risk identified.

7. Financial Controls and Record Keeping

CID Trading Limited maintains accurate financial records and appropriate internal controls.

All employees must:

- Accurately record all transactions
- Declare gifts and hospitality
- Ensure all expenses are properly documented and justified

No “off-the-books” accounts or concealed payments are permitted.

8. Sanctions and Legal Compliance

CID Trading Limited will not engage in business with individuals, organisations, or countries subject to applicable sanctions.

We are committed to complying with all relevant legal and regulatory requirements relating to anti-corruption and financial crime.

9. Reporting Concerns

All employees and stakeholders are encouraged to report concerns regarding bribery or corruption.

Concerns should be raised:

- Through line management, or
- In accordance with the CID Trading Limited Whistleblowing Policy

All reports will be treated confidentially, and no individual will suffer detriment for raising a genuine concern in good faith.

10. Training and Awareness

CID Trading Limited ensures that:

- Employees receive appropriate training on anti-bribery and corruption
- This policy is communicated to all relevant staff and third parties

11. Monitoring and Enforcement

Compliance with this policy will be monitored through:

- Internal reviews and audits
- Management oversight
- Supplier and third-party assessments where appropriate

Breaches of this policy may result in:

- Disciplinary action (including dismissal)
- Termination of contracts with third parties
- Reporting to relevant authorities where required

12. Governance and Responsibility

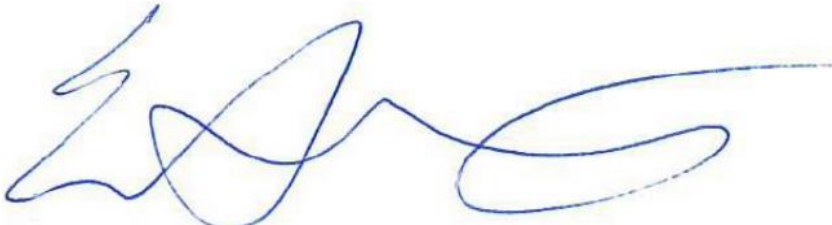
The Board of Directors has overall responsibility for ensuring compliance with this policy.

Day-to-day responsibility rests with the Managing Director and designated responsible managers.

13. Review

This policy will be reviewed annually, or as required due to changes in legislation or business operations.

THE SIGNATURE BELOW DEMONSTRATES THAT THIS DOCUMENT HAS BEEN AUTHORISED:

Company Name	CID Trading Ltd
Document Name	Anti-Corruption and Anti-Bribery Policy
Signed	
Print:	Ted Soulsby
Position	Managing Director
Date:	18/03/2026
Review Date:	18/03/2027