

ETHICAL BUSINESS POLICY

Introduction

JDT is committed to conducting all aspects of its business with the highest standards of ethical conduct, professionalism, and integrity. Our reputation is built not just on what we achieve, but how we achieve it. Every employee, contractor, consultant, or individual acting on behalf of JDT has a responsibility to uphold these standards and contribute to a culture of honesty, accountability, and respect.

This policy sets out JDT's position on preventing bribery, fraud, dishonesty, and unlawful behaviour. The Board of Directors and Senior Management adopt a zero-tolerance approach and are committed to implementing and maintaining effective systems to prevent, identify, and address any form of misconduct.

Scope and Applicability

This policy applies to:

- All JDT employees, regardless of role or seniority;
- Temporary workers, agency staff, consultants, and contractors;
- Anyone acting on behalf of JDT, whether within the UK or internationally.

Any breach of this policy may lead to disciplinary action, contractual consequences, and/or criminal prosecution, depending on the circumstances.

JDT's Ethical Standards

JDT will not engage in or tolerate any conduct that violates legal requirements, breaches ethical principles, or undermines fair competition. Specifically, we prohibit:

- **Bribery and Improper Influence**
Offering, giving, or receiving any gift, payment, hospitality, or benefit with the intention of securing or rewarding a business advantage.
Accepting anything from a third party that is known or suspected to be offered with the expectation of preferential treatment.
- **Facilitation Payments**
Making informal payments to public officials or others to speed up routine administrative processes.
- **Misuse of Assets and Information**
Using JDT's physical or intangible assets—including equipment, software, confidential information, and intellectual property—for unauthorised or personal purposes.
- **Unethical or Anti Competitive Conduct**
Engaging in practices that violate competition or anti-trust laws, or otherwise distort fair market behaviour.
- **Unlawful Information Use**
Acquiring, using, or disclosing another party's proprietary or confidential information without proper authority or legal basis.
- **Contractual Interference**
Inducing or assisting another party to break a contract with a third party.
- **Working with Non-Compliant Partners**
Engaging with suppliers, agents, or representatives who do not align with JDT's ethical values and standards.

Building a Culture of Trust

Ethical business conduct is essential to building long-term, trusted relationships with clients, colleagues, suppliers, and the wider community. A breach of this policy not only compromises that trust but can significantly damage JDT's reputation and legal standing.

Reporting Concerns

All employees and others working with or for JDT are encouraged to raise concerns about suspected breaches of this policy. JDT is committed to protecting those who report concerns in good faith and will take all reports seriously.

Concerns can be reported to your line manager, the HR team, or through JDT's designated reporting procedures. All reports will be handled confidentially and investigated promptly and fairly.

Ongoing Commitment

To embed these principles across the business, JDT will:

- Provide training on ethical behaviour and legal compliance;
- Monitor and update this policy as necessary;
- Integrate ethical standards into recruitment, procurement, and third-party engagement processes.

This policy and statement can be withdrawn or amended it at our discretion.

Authorisation - Signed:

For and on behalf of the Board of Directors

A handwritten signature in black ink, appearing to read 'Craig French'.

Craig French
Director

Date: 30 April 2025