



LIFESTYLE TECHNOLOGY

Anti-Slavery, Anti-Bribery, and Anti-Money Laundering Policies for Intelligent Digital Solutions Limited

1. Introduction

At Intelligent Digital Solutions Limited, we are committed to conducting business with integrity, transparency, and fairness. We uphold the highest ethical standards and comply with all applicable laws and regulations related to modern slavery, bribery, and money laundering. This policy sets out our commitment to preventing slavery, bribery, and money laundering within our company and our supply chain.

I. Anti-Slavery Policy

1. Purpose

This policy outlines our stance on modern slavery, human trafficking, and forced labor. We are committed to ensuring that no such practices exist in any part of our business or supply chain.

2. Scope

This Anti-Slavery Policy applies to all employees, contractors, suppliers, and business partners involved with Intelligent Digital Solutions Limited across all operations, including CCTV installation, access control, and AV solutions.

3. Policy Statement

- Zero Tolerance: We maintain a zero-tolerance approach to any form of slavery, human trafficking, forced labor, or child labor. This applies to all our business activities, from recruitment practices to supplier relationships.
- Employment Practices: All employees are hired through legal and ethical recruitment processes. They receive fair compensation and work under safe and dignified conditions, without coercion or exploitation.
- Supply Chain Due Diligence: We ensure that our suppliers and contractors comply with ethical labor standards. We regularly vet and monitor suppliers to ensure no forced labor or exploitation exists in any part of our supply chain.
- Employee Awareness: Employees receive regular training on how to recognize and report instances of modern slavery within the business and supply chain.

4. Reporting and Whistleblowing

Any employee, supplier, or stakeholder who suspects modern slavery in the business or supply chain can report it confidentially through our whistleblowing hotline or email. All reports are treated with the utmost seriousness and confidentiality.



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5. Supplier Audits and Monitoring

We conduct regular audits of our suppliers, especially in high-risk regions or industries, to ensure compliance with anti-slavery practices. Suppliers failing to meet our ethical standards will be subject to corrective measures or termination of their contracts.

II. Anti-Bribery Policy

1. Purpose

This Anti-Bribery Policy sets out Intelligent Digital Solutions Limited's commitment to preventing bribery and corruption in all aspects of our business dealings. We comply with international anti-bribery laws, such as the UK Bribery Act 2010 and the US Foreign Corrupt Practices Act (FCPA).

2. Scope

This policy applies to all employees, directors, contractors, suppliers, and agents working on behalf of Intelligent Digital Solutions Limited, including during the provision of CCTV, access control, and AV installation services.

3. Policy Statement

- No Tolerance for Bribery or Corruption: We prohibit any form of bribery, including the offering, giving, receiving, or soliciting of money, gifts, or favors as an inducement for business or personal gain.
- Gifts and Hospitality: Employees are prohibited from accepting or offering any gifts, hospitality, or other benefits that could be interpreted as a bribe or influence business decisions. All gifts or hospitality must be transparent and within legal and ethical guidelines.
- Third-Party Relationships: We ensure that third parties, such as suppliers and contractors, do not engage in corrupt practices on our behalf. We conduct due diligence on all third parties before establishing any business relationships.

4. Responsibilities of Employees

Employees must reject any offers of bribes and immediately report any attempt to offer or solicit bribes to management. Employees are required to declare any conflicts of interest and report any suspicious behavior that may indicate bribery.



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5. Reporting Bribery and Corruption

Employees and stakeholders are encouraged to report any concerns or suspicions regarding bribery or corruption through our confidential whistleblowing channel. Reports can be made anonymously, and there will be no retaliation for reporting in good faith.

6. Enforcement and Penalties

Any employee found to have engaged in bribery or corruption will face disciplinary action, up to and including termination of employment, and may also face legal action.

III. Anti-Money Laundering (AML) Policy

1. Purpose

The purpose of this Anti-Money Laundering Policy is to ensure that Intelligent Digital Solutions Limited complies with all legal obligations related to the prevention of money laundering and terrorist financing. We follow regulations like the UK Money Laundering Regulations 2017 and relevant international guidelines to prevent our services and business from being used for illegal financial activities.

2. Scope

This policy applies to all employees, contractors, suppliers, and partners involved with Intelligent Digital Solutions Limited and governs all financial transactions related to CCTV, access control, and AV installation services.

3. Policy Statement

- **Prohibition of Money Laundering:** Intelligent Digital Solutions Limited strictly prohibits money laundering and any activities that facilitate money laundering or terrorist financing. We are committed to ensuring that our business is not used to disguise the proceeds of criminal activity.
- **Know Your Customer (KYC):** We implement robust KYC procedures for all customers and suppliers to verify their identities and assess the legitimacy of their financial transactions. This includes due diligence on any high-risk customers or suppliers.
- **Monitoring and Reporting:** All financial transactions are monitored for suspicious activity, and any irregular or large cash transactions are flagged for investigation. Suspicious transactions will be reported to the appropriate authorities in compliance with Anti-Money Laundering laws.



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4. Responsibilities of Employees

Employees must be vigilant for signs of money laundering, such as unusual financial transactions or customers who are unwilling to provide necessary documentation. Employees must comply with all KYC procedures, including verifying the identities of customers and ensuring that no business is conducted with blacklisted or high-risk entities.

5. Reporting Suspicious Activity

Employees and contractors are required to report any suspicious transactions or activities that may be linked to money laundering to the Anti-Money Laundering Officer (AMLO). Reports can be made confidentially, and failure to report can result in disciplinary action.

6. Record Keeping

We maintain detailed records of all financial transactions and KYC documentation for the required legal period, as specified under local and international anti-money laundering regulations.

IV. Training and Awareness

We provide ongoing training for all employees on anti-slavery, anti-bribery, and anti-money laundering compliance. This ensures that employees understand their responsibilities and can recognize and report any violations of these policies.

V. Enforcement and Disciplinary Action

Failure to comply with the provisions of these policies will result in disciplinary action, which could include dismissal and legal proceedings. Intelligent Digital Solutions Limited will also terminate relationships with suppliers or contractors who violate these policies.

VI. Governance and Oversight

The enforcement and oversight of these policies are the responsibility of senior management at Intelligent Digital Solutions Limited. We will regularly review and update these policies to ensure compliance with legal and regulatory changes.

****Approved by:****

George Kyriacou

Intelligent Digital Solutions Limited

Date: 05/06/2024