

# Anti-Bribery & Corruption Policy

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This document sets out the policy and rules of the Company in relation to anti-bribery and corruption matters as defined within The Bribery Act 2010.

This policy will be made available to all employees and compliance is regarded as part of a Contract of Employment in so far as employees are expected to read and abide by these rules in all aspects. The penalties for both the employee and Company for failure to follow these policies can be severe, including unlimited fines and imprisonment.

## Definitions of Bribery and Corruption

Bribery is the offer, promise, demanding or acceptance of any gift, loan, payment, reward or other advantage as an inducement for an action which is illegal, unethical or breach of trust, in the conduct of the Company's business.

Corruption is the misuse of entrusted power for private gain

Acts of bribery or corruption are intended to influence an individual in the performance of their work to act dishonestly. The person being bribed is usually someone who can obtain, retain or direct business unfairly to the advantage of another person or business.

## The Law

The Bribery Act 2010 has introduced a new offence (Section 7) which makes UK Companies liable if they fail to implement adequate procedures to prevent acts of bribery and corruption by those working for the Company or associated persons who act on its behalf, no matter where in the world the act takes place.

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## Procedures we Adopt to Prevent Bribery and Corruption

This Company is committed to bribery prevention as set out in the following procedures:

### **Risk Assessment**

This Company assesses the nature and extent of risks of bribery on a periodic basis. We then adopt and promote anti-bribery procedures that are proportionate to our size and structure, and to the nature, scale and location of activities undertaken. We will also consider risks associated with particular sectors we operate in. By assessing the risks we will ensure that the anti-bribery procedures we adopt are proportionate to these risks and are clear, practical, accessible and implemented and enforced effectively.

### **Management Commitment**

The Directors and Senior Management of the Company have adopted a “zero tolerance” to bribery and are fully committed to developing and communicating a culture at all levels within the company that bribery is never acceptable.

### **Due Diligence**

We will carry out effective due diligence regarding all persons who will potentially be performing business for or on behalf of the Company. Due diligence will be proportionate to the risks identified.

### **Communication**

We will communicate our anti-corruption policies and procedures both internally and externally as required. Anti-bribery training will be incorporated into the induction procedure for new employees and there will be continuous communication of these procedures for all staff.

### **Monitoring and Review**

We will monitor and review our procedures and policies periodically and update them if necessary to adjust for changes in our business or if incidents occur. We will also monitor and consider what our competitors and others within our industry are doing in this respect.

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## Examples

The following points give examples as to how individuals should act in order to ensure they follow the correct procedures and rules. If any individual is uncertain as to whether their actions comply with this policy they should seek guidance from the Directors or Senior Management.

### **At all times:**

- Behave honestly and in a trustworthy manner and set a good example to others
- Use the Company resources efficiently and correctly and do not misuse those resources
- Make a clear distinction between the interests of the Company and private interests to avoid any conflict of interests
- Ensure that any community support, sponsorship or charitable donations do not constitute bribery
- Confidentially report all incidents, risks and issues which are contrary to this policy document to senior management.
- Raise any issues regarding anti-bribery and corruption laws in connection with Company policies.
- Do not offer or accept bribes.
- Do not offer or accept any gifts or hospitality unless approved by senior management.
- Do not offer facilitation payments which are usually small payments or gifts to facilitate a particular process i.e. a permit or licence.

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## Conclusion

In all situations if in any doubt or if a matter of bribery or corruption is suspected this should be reported to a Director or Senior Management for their information and guidance immediately.

You should also report any instances where you suspect a payment has been extorted or an individual has been put under duress to make a payment.

If preferred these matters can be reported anonymously.

The Company will take firm action against anyone found, after investigation, to be involved in bribery.