

ANTI-CORRUPTION & ANTI-BRIBERY POLICY

The Company unreservedly supports the principal of equal opportunities in employment and opposes all forms of unlawful or unfair discrimination on the grounds of sex, race, nationality, ethnic or national origin, marital status, sexual orientation, age or disability.

It is the Company's Policy to comply with all laws, rules and regulations governing bribery and corruption law everywhere we operate. The Company has a zero tolerance approach to acts of bribery and corruption, by employees or anyone acting on its behalf. Any breach of this Policy will be regarded as a serious matter by the Company which may result in disciplinary action and possibly criminal proceedings.

The Company, its' employees and contractors must never seek, accept or give a bribe, facilitation payment, kickback or any other improper payment.

The Company, its employees and contractors must ensure that they operate with appropriate transparency in all business dealings.

Who is covered by the Policy?

This Policy applies to all individuals working at all levels and grades, including senior managers, directors, employees (whether permanent, fixed-term or temporary), consultants, contractors, and any other person providing services to us (collectively referred to as 'workers' in this Policy).

What is a Bribe?

Bribes can take on many different guises and forms, but typically they involve corrupt intent. There will usually be a 'quid pro quo' – both parties will benefit.

A bribe is a financial or other advantage offered or given:

- to anyone to persuade them or reward them for performing their duties improperly or
- to any public official with the intention of influencing the official in the performance of his/her duties.

Gifts and Hospitality

This Policy does not prohibit normal and appropriate hospitality (given and received) to or from third parties. The giving, or receipt, of gifts is not prohibited if the following requirements are met:

- a) It is not made with the intention of influencing a third party to obtain or retain business or a business advantage, or to reward the provision or retention of business or a business advantage, or in explicit or implicit exchange for favours or benefits
- b) It is given in the Company name, not in an individual's name
- c) It does not include cash or a cash equivalent (such as gift certificates or vouchers)
- d) It is appropriate in the circumstances (i.e. in the UK it is customary for small gifts to be given during the Christmas period)
- e) Taking into account the reason for the gift, it is of an appropriate type and value and given at a suitable time
- f) It is given openly, not secretly
- g) Gifts should not be offered to, or accepted from, government officials or representatives, or politicians or political parties, without the prior approval of a Director of the Company.

Facilitation Payments and Kickbacks

The Company does not make, and will not accept, facilitation payments or "kickbacks" of any kind. Facilitation payments are typically small, unofficial payments made to secure or expedite a routine government action by a government official. Kickbacks are typically payments made in return for a business favour or advantage. Everyone working for, or on behalf of, the Company must avoid any activity that might lead to, or suggest, that a facilitation payment or kickback will be made or accepted.

If any worker is requested to make a payment on behalf of the Company, they must always be mindful of what the payment is for and whether the amount requested is proportionate to the goods or services provided. Workers should always ask for a receipt which details the reason for the payment. If any worker has suspicions, concerns or queries regarding a payment, these should be raised with a Director of the Company.

Company workers must not:

- Offer or take any bribe
- Make any facilitation payment
- Offer or accept any unreasonable, disproportionate gifts or hospitalities.

Donations

The Company does not make contributions to political parties or to trade unions. Only charitable donations that are legal and ethical under local laws and practices are made. No donation must be offered or made without the prior approval of a Director of the Company.

Raising Concerns

If you have any question about the legality or propriety of any offer, gift or promise, payment of anything of value, or any other advantage you should immediately raise your concerns with a Director of the Company.

No worker will suffer any detriment as a result of raising genuine concerns about bribery, even if they turn out to be mistaken.

A handwritten signature in dark ink, appearing to read "Alan Waddington", written over a light blue background.

Alan Waddington
Managing Director
21st April 2016