

Anti-Bribery and Corruption Policy

The Company is committed to comply with all anti-bribery and anti-corruption legislation including the Bribery Act 2010 and aim to ensure that no bribes or other corrupt payments (e.g. Money, favours, free holidays, excessive hospitality), are made, offered, sought or obtained by employees or anyone working for the Company or associated with the Company.

Bribery is a reward, advantage or benefit made or offered for the purpose of improperly obtaining or retaining business or for any other improper purpose or commercial advantage.

Corruption is the misuse of entrusted power for private gain.

This Policy applies to all employees, agents, contractors, subcontractors, consultants, business partners and any other parties (including individuals, partnerships and corporate bodies) associated with the Company and any of their subsidiaries. All must ensure that bribery is prevented, detected and reported. The Managing Director is the named person responsible for overseeing all anti-bribery actions.

Employees should at all times act in accordance with the following provisions:

- Behave honestly, be trustworthy and set a good example.
- Use the resources of the Company in the best interest of the Company and do not misuse those resources.
- Make a clear distinction between the Company and individual private interests to avoid any conflict of interest, and if such conflict does arise, report it to the Managing Director immediately in line with the Conflict of Interest Policy (HR017)
- Ensure that any community support, sponsorship and charitable donations do not constitute bribery, and if in doubt employees should consult the Managing Director
- Confidentially report all incidents, risks and issues which are contrary to this policy document to the Managing Director.

Bribery Offences

Bribing Another Person

A definition of bribery is the offering, promising or giving of a reward to induce a person to perform a relevant function or activity improperly.

Employees must not directly or indirectly offer, promise, pay or give a bribe to any person or authorise such a bribe or accept a bribe. Breach of this policy may result in disciplinary action up to and including dismissal.

Bribing a Foreign Public Official

Employees must not try to influence a foreign public official with the intention of obtaining or retaining business in a situation where the public official was not permitted or required by law to be influenced. Breach of this policy may result in disciplinary action up to and including dismissal.

Failure to Prevent Bribery

This is a “Corporate Offence” which occurs when a Company fails to stop those who are operating on its behalf from being involved in bribery, i.e. an employee, a consultant or an agent for example, resulting in the company gaining or retaining business.

Political Donations

The company does not make political donations and the Company is not affiliated with any political party, independent candidate, or with any other organisation whose activities are primarily political.

Employees and other associated parties are free to make personal donations provided such payments are not purported to be made on behalf of the Company and are not made to obtain any form of advantage in any business transaction.

Consequences of Bribery

Anyone or any Company found guilty of bribery under the Act may face fines and/or prison terms. In addition, high legal costs and adverse publicity are likely to result from any breach of the Act.

For employees of the Company, failure to comply with this Policy and/or with the Act may result in:

- Disciplinary action which may include dismissal; and
- Criminal penalties under the Act which may result in a fine and/or imprisonment for up to 10 years.
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For the Company, any breach of this Policy by any employee or business associate may result in:

- The Company being deemed to be in breach of the Act.
- The Company being subject to fines.
- The Company suffering negative publicity and further associated damage as a result of such breach.

REVISION AND ISSUE STATUS

Anti-Bribery/Corruption Policy

Issue No	Page No	Date Issued	Changes Made	Amended by
001	Whole Document		New Policy issued	