

## ANTI BRIBERY AND CORRUPTION POLICY STATEMENT

---

### Introduction

Bribery is only a form of corruption, but corruption also includes many other dishonest practices such as embezzlement, fraud, nepotism, collusion and abuse of power. This is the key difference between bribery and corruption.

Most people assume that bribery and corruption have the same meaning. But this is not exactly correct. Bribery involves dishonestly persuading someone to act in your favour by giving him or her a gift of money or another inducement. But corruption refers to dishonest or illegal behaviour in general, especially by those in a position of power.

Bribery & Corruption is, in the conduct of the company's business, the offering or accepting of any gift, loan, payment, reward or advantage for personal gain as an encouragement to do something which is dishonest, illegal or a breach of trust.

Bribery and corruption is a criminal offence. The Company prohibits any form of bribery & corruption. We require compliance, from everyone connected with our business, with the highest ethical standards and anti-bribery & corruption laws applicable. Integrity and transparency are of utmost importance to us and we have a zero tolerance attitude towards corrupt activities of any kind, whether committed by The Company's employees or by third parties acting for or on behalf of The Company

### Offences

It is a criminal offence to:

- offer a bribe;
- accept a bribe;
- bribe a foreign official;
- as a commercial organisation, to fail to prevent a bribe.

You should be aware that if you are found guilty by a court of committing bribery, you could face up to 10 years in prison and/or an unlimited fine. The Company could also face prosecution and be liable to pay a fine.

### Purpose

The purpose of this policy is to convey to all employees and interested parties of the rules of the Company in relation to our unequivocal stance towards the eradication of bribery & corruption and our commitment to ensuring that The Company conducts its business in a fair, professional and legal manner.

### Scope

This policy applies to all employees of The Company, regardless of seniority or site. It also extends to anyone working for or on our behalf e.g. those engaged by us on a self-employed basis or an agency arrangement.

We will encourage the application of this policy where our business involves the use of third parties e.g. suppliers; contractors.

## **Policy**

It is prohibited, directly or indirectly, to offer, give, request or accept any bribe i.e. gift, loan, payment, reward or advantage, either in cash or any other form of inducement, to or from any person or company in order to gain commercial, contractual or regulatory advantage for the Company, or in order to gain any personal advantage for an individual or anyone connected with the individual in a way that is unethical.

It is also prohibited to act in the above manner in order to influence an individual in his capacity as a foreign public official. You should not make a payment to a third party on behalf of a foreign public official.

If you are offered a bribe, or a bribe is solicited from you, you should not agree to it unless your immediate safety is in jeopardy. You should immediately contact the Compliance Officer so that action can be taken if considered necessary. You may be asked to give a written account of events.

If you, as an employee or person working on our behalf, suspect that an act of bribery, or attempted bribery, has taken place, even if you are not personally involved, you are expected to report this to the Compliance Officer. You may be asked to give a written account of events.

Appropriate checks will be made before engaging with suppliers or other third parties of any kind to reduce the risk of our business partners breaching our anti-bribery & corruption rules.

The Company will ensure that all of its transactions, including any sponsorship or donations given to charity, are made transparently and legitimately.

The Company takes any actual or suspected breach of this policy extremely seriously and will carry out a thorough investigation should any instances arise.

We will uphold laws relating to bribery & corruption and will take disciplinary action against any employee, or other relevant action against persons working on our behalf or in connection with us, should we find that an act of bribery, or attempted bribery, has taken place. This action may result in your dismissal if you are an employee, or the cessation of our arrangement with you if you are self-employed, an agency worker, contractor etc.

Staff are reminded of the Company's Whistleblowing policy which is available in the Employee Handbook, or upon request.

## **Gifts and hospitality**

We realise that the giving and receiving of gifts and hospitality where nothing is expected in return helps form positive relationships with third parties where it is proportionate. This does not constitute bribery and consequently such actions are not considered a breach of this policy.

*Gifts* include vouchers; goods (flowers, food, drink, event tickets when not used in a hosted business context); services given or received as a mark of friendship or appreciation.

*Hospitality* includes entertaining; meals or event tickets (when used in a hosted business context) given or received to initiate or develop relations. Hospitality will become a gift if the host is not present.

As the law is constantly changing, this policy is subject to review and the Company reserves the right to amend this policy without prior notice.