



## Anti-Bribery and Corruption Policy

*Bribery or corruption could seriously damage our business and our Company reputation.*

<b>Scope</b>	This Policy applies to all employees, officers, consultants and contractors of the Company and its subsidiaries. In addition this Policy also applies to all agents, representatives or other third party intermediaries providing services and retained by Company.
<b>Our Policy</b>	<p>We will never offer, pay, solicit, or accept bribes in any form, either directly or indirectly. We will not participate in any kind of corrupt activity, either directly or through any third party.</p> <p>We will take disciplinary action against employees who are found to be giving or taking bribes or who offer, promise, or give any improper or corrupt financial or other advantage. This may lead to dismissal or termination of employment and, if appropriate, criminal proceedings.</p> <p>We will terminate business relationships with any agent or third party representative that violates any provision of this Policy.</p>
<b>Guidance Information</b>	<p><b>Bribery</b> is offering, providing, or receiving something of value, including cash, gifts, hospitality, or entertainment, to persuade someone to do something or as a reward for something improper or illegal. Any demand for, or offer of, a bribe in whatever form to any company employee or representative must be rejected and reported immediately to your Line Manager.</p> <p><b>Corruption</b> involves, but is not limited to, any of the following types of activities: bribery, extortion, fraud, deception, collusion, abuse of power, embezzlement, and money laundering.</p>
<b>We Will Not</b>	<p>We will not take part in any bribery or corrupt behaviour or activity or allow others to do so, on behalf of the Company.</p> <p>We will not give, receive, ask for or permit anyone else to give bribes or engage in any corrupt activities to win new business, retain business, or otherwise secure the Company any form of improper business advantage.</p> <p>We will not choose agents or third party representatives who contravene our standards and any applicable regulatory requirements.</p> <p>We will not pay more than a fair market price for goods and services.</p> <p>We will not pay any form of facilitation or enabling payments to speed up or otherwise procure a transaction. These are the same as bribes.</p> <p>We will not hide or fail to record properly our activities or falsify any company records or accounts.</p>
<b>We will Always</b>	<p>We will always comply with applicable legislation such as the UK Bribery Act 2010 and the US Foreign Corrupt Practices Act 1977.</p> <p>We will always ensure that fees paid for services from third parties, agents, intermediaries, advisors, and consultants are for legitimate business purposes and are consistent with the service provided.</p>

**Further  
Information**

We will always comply with applicable bribery and corruption laws that apply in the country where we are doing business.

We will always report any attempts to bribe us or to ask for bribes from us and any suspicions of bribery or corrupt behaviour.

Sometimes you know what the right thing to do is but sometimes there is an element of doubt. If you are unsure, then ask and remind yourself:

- Does it comply with the Policy and the Company Code of Business Conduct?
- Would I be embarrassed if anyone within or outside of the Company knew about the situation or my actions?
- The Policy applies not only to employees but also to anyone providing services to the Company. I cannot arrange for someone else to do something that I know I am prohibited from doing.
- Bribes are illegal no matter what the local custom or practice may be – for example in giving expensive gifts or the provision of what may be perceived as lavish entertainment.

Please read the following (accessible via CSR Policies on Company website and via the Company Policy section of the Company Intranet):

Company Code of Business Conduct

Gifts & Entertainment Policy (available via the Company Intranet only)

Briefing Note on UK Bribery Act 2010 (available via the Company Intranet only)

Please Speak To:

Your Managing Director/Finance Director

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