



Anti-Bribery Policy Statement

Key points

This policy statement provides clarification on our commitment to compliance with our obligations under the Bribery Act 2010. It applies to all employees and to all businesses who carry out work on behalf of the Company.

The Directors have set out this Anti-Bribery Policy and will monitor compliance and effectiveness and will take any breaches very seriously.

Policy Statement:

- The Company prohibits the offering, the giving, the solicitation, or acceptance of any bribe, whether in the form of cash or any other inducement to or from any person or company, in order to gain any commercial, contractual, or regulatory advantage, or to gain any personal advantage, pecuniary or otherwise, for any individual or anyone connected with the individual.
- The Company prohibits “facilitation” or “grease” payments.
- Bribery is a criminal offence and can lead to heavy fines against the Company and individuals. Any incident of bribery will be reported to the police. The Company will take severe disciplinary action will be taken against any employee involved.
- It is permitted to give small gifts, for example pens and note pads bearing the Company logo and to provide limited entertainment, for example an evening meal, where business is discussed, as long as it is clear that the gift or entertainment are not in any way intended as an inducement.
- It is permitted to receive small gifts, for example pens and note pads bearing a Company logo and to accept limited entertainment, for example an evening meal, where business is discussed, as long as it is clear that the gift or entertainment are not in any way intended as an inducement. If in doubt decline the gift or entertainment.
- If you are offered a bribe, suspect someone else has been offered a bribe or has offered a bribe, then you must inform the Managing Director immediately. Do not fear any repercussions from making such a report to the Managing Director, who will ensure that you are protected in accordance with the Public Interest Disclosures Act 1998, which provides protection against victimisation or dismissal of workers who blow the whistle on criminal behaviour or other wrongdoing.