



Anti-Bribery Policy

Introduction

The Company is committed to the highest standards of ethical conduct and integrity in its business activities and as such, we will not tolerate any form of bribery with our Organisation or directed to any person within our Organisation.

Every employee and individual acting on the company's behalf is responsible for maintaining the company's reputation and for conducting company business honestly and professionally.

The Bribery Act 2010 came into force on 1st July 2011 and made it a criminal offence to offer, promise or accept a bribe.

All employees and associated persons are required to comply with this policy, in accordance with the Bribery Act 2010.

What is a Bribe

A bribe is a financial advantage or other reward that is offered to, given to, or received by an individual or company (whether directly or indirectly) to induce or influence that individual or company to perform public or corporate functions or duties improperly.

Employees and others acting for or on behalf of the company are strictly prohibited from making, soliciting or reviewing any bribes or unauthorised payments.

As such you should not offer, promise, give, request, agree to receive, or accept any bribes:

- During the course of employment
- When conducting company business; or
- When representing the company in any other capacity

Procedure for Offering or Accepting Gifts, Hospitality etc.

Any gifts, rewards or entertainment received or offered from clients, public officials, suppliers or other business contacts should be reported immediately to your Line Manager or Rory Earnshaw.

In certain circumstances, it may not be appropriate to retain such gifts or be provided with the entertainment and employees and associated persons may be asked to return gifts to the sender or refuse the entertainment, for example, where there could be a real or perceived conflict of interest. As a general rule, small tokens of appreciation, such as flowers or a bottle of wine, may be retained by employees.

If you wish to provide gifts to suppliers, clients or other business contacts, prior written approval must be obtained from Rory Earnshaw. these will be authorised only in limited circumstances and must be proportionate, reasonable and made in good faith.