

BRIBERY POLICY

DATE: August 2020



1. Introduction

This policy is intended to provide advice to staff who in the course of their day to day work or as a result of their employment, either receive offers of gifts and hospitality or provide gifts and hospitality to others on behalf of the Company. This policy will be communicated to the Company's suppliers, agents, associated companies and business partners.

2. Anti-corruption statement

The Company is committed to maintaining an ethical and integral working environment. The Company strictly prohibits any form of unethical inducement or payment including facilitation payments and kick-backs or any conduct which might conflict with the Company's interests or compromise the Company's integrity.

All decisions by the Company's staff on the provision or acceptance of gifts and hospitality must be able to withstand both internal and external scrutiny. The acceptance of gifts or hospitality must be justified as being in the direct interests of the business, as being proportionate to those interests and within limits that are acceptable to the Company.

The Company considers it a serious offence for employees to accept gifts, hospitality or consideration as an inducement for doing something or refraining to do something in their official capacity or for showing favour or disfavour to any person, company or business.

The Company may face criminal and heavy financial penalties in circumstances where the Company is found to be receiving or making bribes or found to have failed to prevent bribery. Therefore it is important that all staff observe and comply with the principles set out below. Failure to do so could result in disciplinary action up to and including summary dismissal.

3. Monitoring and Review

The board of the Company has overall responsibility for the operation of this policy and will review the implementation of the policy periodically. The day to day operation of this policy is delegated to Finance.

4. Principles

You must apply the following principles in the conduct of your employment:

- x You (and your immediate family) must not accept gifts, hospitality or benefits of any kind from a third party which might be perceived as compromising your personal judgement or integrity;
- x You (and your immediate family) must not receive any form of hospitality or gifts from any third party participating in an active tender with the Company;
- x You must not accept gifts, hospitality or benefits of any kind from a third party for the purpose of securing a contract or business relationship for the Company.
- x You must not put yourself in a position which would cause your private interests to conflict with the Company's interests or your duties;
 - What form of entertainment is proposed;
 - (b) Who will be attending from the Company and from the client;
 - (c) How it is considered that the Company's business interest will be

furthered by the proposal; and

(d) The costs to be incurred.

4.3 Your manager will discuss your proposal and inform you if it is authorised.

- x You must not make use of your position to further your private interests or those of others;
- x You must base all business decisions, negotiations and dealings solely on the Company's best interests;
- x You must not procure the services of a company, client or supplier solely on the basis of receiving or the expectation of receiving gifts, hospitality or benefits of any kind or the expectation;
- x You must not accept or provide, directly or indirectly, gifts or hospitality or benefits of any kind to a foreign public official for the purpose of obtaining or retaining business;
- x You must not give or receive, directly or indirectly, donations, gifts, hospitality or benefits to any political parties.
- x You must declare any private interests to your manager even if you are in doubt as to whether there is a conflict;
- x You must refer to your manager when faced with a situation for which there is no adequate guidance.

5. Acceptance of Gifts

5.1 Cash or Cash Equivalents

Offers of cash or cash equivalents (e.g. gift vouchers or gift cheques) made clients, contractors, suppliers or any other person, firm or company must not be accepted and must be reported to your manager immediately.

5.2 Non Cash Gifts

Gifts of a small or inexpensive nature such as calendars or diaries or other simple or inexpensive items can be accepted but must still be declared to your manager. This type of gift can be easily distinguishable from more expensive or substantial items which cannot on any account be accepted. If there is any doubt as to whether the acceptance of such an item is appropriate, the matter should be referred to your manager immediately.

5.3 Exceptional Cases

It is recognised that there are exceptional cases where refusal of a gift will clearly offend a donor, cause embarrassment or appear discourteous. In these cases the donor should be advised that the permission of your manager will have to be sought as to whether or not the gift can be accepted.

6. Hospitality

The handling of offers of hospitality is recognised as being much more difficult to regulate but it is an area in which staff must exercise careful judgment. It is recognised that it can be as embarrassing to refuse hospitality as it can be to refuse a gift. There is also



the need to distinguish between simple, low cost hospitality of a conventional type, i.e. a working lunch or evening meal compared with more expensive and elaborate hospitality. Reasonable offers of hospitality may be accepted provided they do not place you under any obligation and are

Signed: .....

Managing Director

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