

Anti- Bribery Policy

It is the company's policy to conduct all of our business in an honest and ethical manner. We take a zero-tolerance approach to bribery and corruption and are committed to acting professionally, fairly and with integrity in all our business dealings and relationships wherever we operate and implementing and enforcing effective systems to counter bribery.

In this policy, third party means any individual or organisation you come into contact with during the course of your employment, and includes actual and potential clients, customers, suppliers, distributors, business contacts, agents, advisors and government and public bodies, including their advisors, representatives and officials, politicians and political parties.

A bribe is an inducement or reward offered, promised or provided in order to gain any commercial, contractual, regulatory or personal advantage.

You should at all times act in accordance with the following provisions:

- Ensure that you read, understand and comply with this policy
- Behave honestly, be trustworthy and set a good example
- Use the resources of the company in the best interests of the company and do not misuse those resources
- Make a clear distinction between the interests of the company and your private interests to avoid any conflict of interest, and if such conflict does arise report it to your line manager immediately
- Ensure that any community support, sponsorship and charitable donations do not constitute bribery, and if in doubt you should consult your line manager
- Confidentially report all incidents, risks and issues which are contrary to this policy to your line manager
- Bring to the company's attention any breach or potential breach of the company's anti-bribery policy
- Do not offer or accept bribes
- Do not offer money to any public officials in order to speed up services or gain improper advantage. This type of bribery is a "facilitation payment" and is illegal. If you are faced with a demand for a facilitation payment you must:
 - Actively resist the payment
 - Inform your line manager

Gifts and Hospitality

This policy does not prohibit normal and appropriate hospitality (given and received) to or from third parties. The giving or receipt of gifts is not prohibited, if the following requirements are met:

- It complies with local law
- It is given in the company name, not in your name
- It does not include cash or a cash equivalent (such as gift certificates or vouchers)
- It is appropriate in the circumstances (for example at Christmas)
- Taking into account the reason for the gift, it is of an appropriate type and value and given at an appropriate time
- It is given openly, not secretly; and
- Gifts should not be offered to, or accepted from, government officials or representatives, or politicians or political parties, without the prior approval of your line manager

It is not acceptable for you (or someone on your behalf) to:

- Give, promise to give, or offer, a payment, gift or hospitality with the expectation or hope that a business advantage will be received, or to reward a business advantage already given
- Accept payment from a third party that you know or suspect is offered with the expectation that it will obtain a business advantage for them
- Accept a gift or hospitality from a third party if you know or suspect that it is offered or provided with an expectation that a business advantage will be provided to the company in return
- Threaten or retaliate against another employee who has refused to commit a bribery offence or who has raised concerns under this policy; or
- Engage in any activity that might lead to a breach of this policy

Record Keeping

- The company will keep financial records and have appropriate internal controls in place which will evidence the business reason for making payments to third parties
- All employees must declare and keep a written record of all hospitality or gifts accepted or offered, which will be subject to managerial review
- All employees must ensure all expense claims relating to hospitality, gifts or expenses incurred to third parties are submitted in accordance with the company's expenses policy and specifically record the reason for the expenditure
- All accounts, invoices, memoranda and other documents and records relating to dealings with third parties, such as clients, suppliers and business contacts, should be prepared and maintained with strict accuracy and completeness. No accounts must be kept "off-book" to facilitate or conceal improper payments

How To Raise A Concern

You are encouraged to raise concerns about any issue or suspicion of malpractice at the earliest possible stage. If you are unsure whether a particular act constitutes bribery or corruption, or if you have any other queries, these should be raised with your line manager in the first instance.

Protection

Employees who refuse to accept or offer a bribe, or those who raise concerns or report another's wrongdoing, are sometimes worried about possible repercussions. The company aims to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken.

The UK anti-bribery legislation applies to all activities of a UK-based business no matter where they are carried out in the world. This policy therefore applies to ALL activities worldwide, whatever the local law, practice or custom may be.

By complying with this policy we aim to ensure that you and the company will not at any time knowingly breach any relevant anti-bribery and corruption legislation and also that by adhering to the policy the company can demonstrate that it has adequate procedures in place to prevent such activity.

All employees have an independent obligation to prevent bribery and corruption in the company and ensure that any interaction with public officials complies with this policy and relevant laws.

