

Anti-bribery and Corruption Policy

Bribery is the offer or receipt of any gift, loan, payment or reward or other advantage to or from any person as an encouragement to do something which is dishonest, illegal or a breach of trust, in the conduct of the Company's business.

Corruption is the misuse of entrusted power for private gain.

The policy document is not regarded as exhaustive but, does give specific examples of situations and sets out the rules and procedures which should be followed.

You should always act in accordance with the following provisions:

- 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 you should report it to the Company Secretary immediately
- ensure that any community support, sponsorship, and charitable donations do not constitute bribery
- confidentially report all incidents, risks and issues which are contrary to this policy document to the Company Secretary
- raise any issues regarding anti-bribery and corruption laws and the Company's policies. Queries will be dealt with anonymously and a written response will be issued
- do not offer or accept bribes
- do not, without express prior written approval from the Company Secretary, offer or accept any gifts or hospitality to or from clients, contractors, suppliers, other third parties or public officials.

The UK anti-bribery and corruption 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.

Any breaches of this policy will be investigated thoroughly and could result in disciplinary action being instigated.

This policy will be briefed at induction to all new employees.



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