



## ANTI - BRIBERY AND CORRUPTION POLICY

This document sets out the rules of the Company in relation to anti-bribery and corruption matters in the United Kingdom.

Compliance with the Company's policy in relation to bribery and corruption is regarded as part of your contract of employment. If you fail for any reason to follow the rules set out in this document this may result in disciplinary action being taken against you which could in turn lead to your dismissal.

**Bribery** is the offer or receipt of any gift, loan, payment, reward or other advantage to or from any person as an encouragement to do something that 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. To place this in context, you should be aware that if you engage in activities which are contrary to UK anti-bribery and corruption legislation, you could face up to 10 years in prison and/or an unlimited fine, the Company could also be liable to an unlimited fine and Government sanction.

This policy document is not regarded as exhaustive, but does give specific examples of situations and sets out the rules and procedures that should be followed. If you are at any time uncertain as to whether your actions will comply with this policy, you must seek guidance from the Company Secretary.

### **You should at all times 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 own private interests to avoid any conflict, 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, if in doubt consult the Company Secretary
- Confidentially report any 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 with the Company Secretary
- Do not offer or accept monetary bribes for anything
- Do not offer money to any public officials in order to speed up service or to gain an improper advantage. This type of bribery is a 'facilitation payment' and is illegal. If you



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are presented with a demand for a facilitation payment you must:

1. Actively resist the payment and point out our policy
  2. Inform the Company Secretary immediately
- Do not, without express prior written approval from a Director, offer or accept any gifts or hospitality to or from clients, contractors, suppliers, other third parties or public officials.

**Gifts** are presents such as flowers, vouchers, food and drink. Event and travel tickets given to you as an individual are also gifts when they are not to be used in a hosted business context.

**Hospitality** includes invitations to hosted meals, receptions and events for business purposes.

**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.**

By complying with this policy document we aim to ensure that neither you nor the Company will 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.

As an employee you have an independent obligation to prevent bribery and corruption in the Company and to ensure that any interaction with public officials complies with this policy document and relevant laws.

Signed

Date 06/01/2019

P.N. TRANT  
Managing Director