

Anti-Corruption and Bribery Policy Statement

It is our 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. Any employee who breaches this policy will face disciplinary action, which could result in dismissal for gross misconduct. Any non-employee who breaches this policy may have their contract terminated with immediate effect.

This policy does not form part of any employee's contract of employment and we may amend it at any time, subject to notification to all staff. It will be reviewed regularly.

Application

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners.

What Is Bribery?

Bribe means a financial or other inducement or reward for action which is illegal, unethical, a breach of trust or improper in any way. Bribes can take the form of money, gifts, loans, fees, hospitality, services, discounts, the award of a contract or any other advantage or benefit.

Bribery includes offering, promising, giving, accepting or seeking a bribe. All forms of bribery are strictly prohibited. Nobody, on behalf of the organisation, shall:

- give or offer any payment, gift, hospitality or other benefit in the expectation that a business advantage will be received in return, or to reward any business received;
- accept any offer from a third party that you know or suspect is made with the expectation that we will provide a business advantage for them or anyone else;
- give or offer any payment (sometimes called a facilitation payment) to a government official in any country to facilitate or speed up a routine or necessary procedure.

This policy does not prohibit the giving or accepting of reasonable and appropriate hospitality for legitimate purposes such as building relationships, maintaining our image or reputation, or marketing our products and services. These should not be unduly lavish or extravagant, or seen as an inducement or reward for any preferential treatment (for example, during contractual negotiations or a tender process). Such gifts or hospitality will always be given in the Company's name, not personally.

We will endeavour to maintain all accounts, invoices, and other records relating to dealings with third parties including suppliers and customers, with strict accuracy and completeness. Accounts will never be kept "off-book" to facilitate or conceal improper payments.

If anyone suspects that any bribery, corruption or other breach of this policy has occurred or may occur, they should notify a Director as soon as possible.

Tim Webber

Chairman

Date: 29th January 2017 –Review Date 31st January 2018