

Anti-Corruption and Bribery Policy Statement

Bribery includes offering, promising, giving, accepting or seeking a bribe and through awareness and implementation of this policy we aim to maintain our reputation as an honest and ethical organisation. A bribe is considered to be 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.

Aims

The Barnfield group of companies are based on the belief that all of our business should be conducted 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.

Objectives

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.

Responsibilities and Commitment

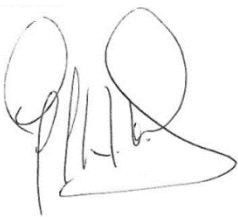
This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners. Any employee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

The Directors are responsible for ensuring this policy is effectively implemented and reviewed, and that all employees and stakeholders are aware of its provisions.

If any interested party 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.

Periodic review

This policy will be reviewed annually, or more frequently in the event of any changes to statutory requirements or any evidence that the policy is not fully effective.

A handwritten signature in black ink, appearing to read 'Tim Webber', written over a light grey grid background.

Tim Webber
Chairman & Managing Director
Date: 31/01/2019