



Bribery Policy

It is the Group's policy to conduct business in an honest way, and without the use of corrupt practices or acts of bribery to obtain an unfair advantage.

This is not just a cultural commitment on the part of the organisation; it is a legal requirement.

Bribery and corruption harm the societies in which the acts are committed. Such behaviour undermines the economy, stunts democratic development and disorders markets. It is a moral as well as a legal issue.

This policy has been adopted by the Group's board. The board attaches the utmost importance to this policy and applies a 'zero tolerance' approach to acts of bribery and corruption.

The Group commits to;

- Training all employees so that they can recognise and avoid the use of bribery by themselves and others;
- Encouraging its employees to be vigilant and to report any suspicion of bribery, providing them with suitable channels of communication and ensuring sensitive information is treated appropriately;
- Rigorously investigating instances of alleged bribery and assisting the police and other appropriate authorities in any resultant prosecution;
- Taking firm and vigorous action against any individual(s) involved in bribery, including dismissal and removal from approved suppliers.

Further Clarification

The policy prohibits the influencing of someone to act, in the belief that he or she will probably do so primarily in return for the conferring of an advantage (offering a bribe) on that person or a third party. So this could cover seeking to influence a decision-maker by giving some kind of extra benefit to that decision maker rather than by what can legitimately be offered as part of a tender process.

This policy is not meant to prohibit the following practices providing they are customary in a particular market, are proportionate and are properly recorded:

- normal and appropriate hospitality
- the giving of a ceremonial gift on a festival or at another special time

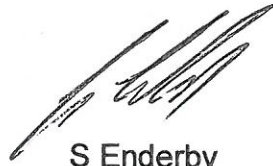
Inevitably, decisions as to what is acceptable may not always be easy. If anyone is in doubt as to whether a potential act constitutes bribery, the matter should be referred to a Group Director before proceeding.

Employee Responsibility

The prevention, detection and reporting of bribery is the responsibility of all employees throughout the Group.

DO NOT do anything that will influence someone to act, in the belief that they will probably do so in return for the gaining of an advantage to that person, a third party or the company.

Signed



Position

Managing Director

Name

S Enderby

Date

01/03/2019

Reviewed

March 2019 (no changes required)

Copies are also available on the company website and in the QMS.