



## Anti-Bribery Policy

The Company is bound by the Bribery Act 2010 and takes a zero-tolerance attitude to bribery. A bribe is an inducement or reward offered promised or provided in order to gain a commercial personal or other advantage.

### The Company prohibits:

The offering, the giving, the solicitation or the acceptance of any bribe, whether cash or other inducement to or from any person or company, wherever they are situated and whether they are a public official or body or private person or company by any individual employee, agent or other person or body acting on the Company's behalf in order to gain any commercial, contractual or regulatory advantage for the Company in a way which is unethical or in order to gain any personal advantage, pecuniary or otherwise, for the individual or anyone connected with the individual. The Company recognises that market practice varies across the territories in which it does business and what is normal and acceptable in one place may not be in another. This policy prohibits any inducement which results in a personal gain or advantage to the recipient or any person or body associated with them, and which is intended to influence them to take action which may not be solely in the interests of the Company or of the person or body employing them or whom they represent.

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
- The use of any recognised fast-track process which is available to all on payment of a fee
- The offer of resources to assist the person or body to make the decision more efficiently provided that they are supplied for that purpose only.

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 the local senior manager with responsibility for this policy before proceeding. If necessary, guidance should also be sought from either the Managing Director or person who deals with HR matters.



## Employee Responsibility

The prevention, detection and reporting of bribery is the responsibility of all employees throughout the Company. If an employee is unsure about any issue, then please raise it with your manager or other a director. Suitable channels of communication by which employees or others can report confidentially any suspicion of bribery will be treated as a public interest disclosure issue (see appropriate policy) as long as it is done in good faith.

It is not acceptable for you or any agent of yours to:

- Give or promise to give any payment gift or hospitality to promote or reward a business advantage
- Receive any payment gift or hospitality from any customer candidate or third party in the hope that a business advantage would accrue for them
- Conceal any evidence of misconduct by a colleague or third party
- Engage in any activity that would lead to a breach of the Bribery Act 2010

You must report any concerns relating to possible or actual instances of bribery.