

## **BRIBERY & CORRUPTION POLICY.**

It is our policy to comply with the Bribery Act 2010.

We do not encourage paying a bribe specifically to:

- Get business
- Maintain business
- Gain a business advantage

And as such have put a procedure in place which must be adopted by all persons who are in a position to give someone a financial or other advantage

- to encourage that person to perform their functions or activities improperly
- to reward that person for having already done so.

It also applies to those within the company who are in a position to accept, agree to receive or request a financial or other advantage

- with intention of performing the function or activity improperly or resulting in it doing so,
- as a reward for improper performance of activity or function

We have adopted the following six principles during our strategic review and have incorporated them within our management systems:

- Actions are proportionate to the size of our company and consistent with the UK market.
- As the Managing Director, I have been actively involved in implementing the system and ensuring that all staff (especially key people), understand what will not be tolerated and the outcomes should this occur.
- A risk assessment of bribery risks has been conducted and is reviewed and updated as necessary, where we enter into any new business arrangements or new markets
- We will only engage trustworthy people in our business dealings and conduct due diligence to gain this knowledge.
- This policy and procedures have been communicated throughout the company. A statement relating to bribery and the disciplinary measures associated with it has been issued.
- An audit of the bribery procedures is undertaken in line with our management system audits.

Bona fide hospitality, promotional or other business expenditure will only be entered into following discussion and agreement at Board level.

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