

## **ANTI-BRIBERY POLICY**

We are committed to applying the highest standards of ethical conduct and integrity in our business activities. We believe that bribery and corruption has a detrimental impact on any business. We strive to carry out our business in a transparent and ethical way. Transparent, fair conduct helps to foster deeper relationships of trust between the company and its clients and customers.

You and any individual acting on our behalf are responsible for maintaining our reputation and for conducting business honestly, ethically and professionally. Therefore, the company does not tolerate any form of bribery, whether direct or indirect, by, any of its employees, agents or consultants or any persons or companies acting for it or on its behalf.

A bribe is a financial or other type of advantage that is offered, given or requested with: - the intention of inducing or rewarding improper performance of a function or activity; or the knowledge or belief that accepting such a reward would constitute the improper performance of such a function or activity.

A relevant function or activity includes public, or business activities or any activity performed in the course of a person's employment, or on behalf of another company or individual, where the person performing that activity is expected to perform it in good faith, impartially, or in accordance with a position of trust.

You and others acting for or on behalf of the company are strictly prohibited from making, soliciting or receiving any bribes or unauthorised payments.

A suspected breach of our anti-bribery rules or policy will be investigated and be treated as grounds for disciplinary action which could result in a finding of gross misconduct, and immediate dismissal.

If there is suspicion of bribery you may be suspended pending the investigation.

Bribery is a criminal offence that may result in up to 10 years' imprisonment and/or an unlimited fine for the individual and an unlimited fine for the company, as well as potential damage to our reputation.

The company will not conduct business with service providers, agents or representatives that do not support the company's anti-bribery objectives. The company reserves the right to terminate its contractual arrangements with any third parties acting for, or on behalf of, the company with immediate effect where there is evidence that they have committed acts of bribery.

The success of the company's anti-bribery measures depends on you, and those acting for the company, playing their part in helping to detect and eradicate bribery. All employees and others acting for, or on behalf of, the company are therefore encouraged to report any suspected bribery in accordance with our procedures. The company will support any individuals who make such a report, provided that it is made in good faith.

If you are unsure about any of the contents of this policy, please speak to Neil Sampson. April 2021