



ANTI BRIBERY POLICY

1.0 Purpose

The purpose of this policy is to establish controls to ensure compliance with the Bribery Act 2010 and to ensure that the company's business is conducted in a socially responsible manner.

2.0 Policy Statement

The Bribery Act sets out two types of offence:

- * Active Bribery – the offering, promising or giving a bribe.
- * Passive Bribery – requesting, agreeing to receive, or the accepting of a bribe.

It is our policy to conduct all of our business in an honest and ethical manner. We take a zero tolerance approach to bribery and corruption. We are committed to acting professionally, fairly and with integrity in all our business dealings and relationships wherever we operate and implementing and enforcing effective systems to counter bribery.

We will fully comply with the Bribery Act 2010 in order to counter bribery and corruption.

Bribery and corruption are punishable for individuals by up to ten years' imprisonment and a fine. If we are found to have taken part in corruption, we could face an unlimited fine, be excluded from tendering for public contracts and face damage to our reputation. We therefore take our responsibilities very seriously.

3.0 Scope

3.1 Who is covered by the policy?

In this policy, third party means any individual or organisation you come into contact with during the course of your work for us and includes actual and potential clients, customers, suppliers, distributors, business contacts, agents, advisers, and government and public bodies, including their advisors, representatives and officials, politicians and political parties.

This policy applies to all employees but in particular to: Directors, Managers and Sales Staff (whether permanent, fixed-term or temporary), collectively referred to as employees in this policy.

This policy covers:

- * Bribes.
- * Gifts and hospitality.
- * Political contributions.

3.2 Bribes

Employees must not engage in any form of bribery, either directly or through any third party (such as an agent or distributor).

3.3 Gifts and hospitality

Employees must not offer or give any gift or hospitality:

- * which could be regarded as illegal and improper, or which violates the recipient's policies; or
- * to any public employees or government officials or representatives, or politicians or political parties; or
- * which exceeds £150 in value for each individual gift or £150 in value for each hospitality event (not to exceed a total value of £400 in any financial year), unless approved in writing by the employee's line manager/director.



Employees may not accept any gift or hospitality from our business partners (third party) if:

- * it exceeds £100 in value for each individual gift or £100 in value for each hospitality event (not to exceed a total value of £300 in any financial year), unless approved in writing by the employee's line manager/director; or
- * it is in cash; or
- * there is any suggestion that a return favour will be expected or implied.

Where this policy requires written approval to be given, the Company Secretary shall put in place a process to maintain a register of all such approvals.

4.0 Your responsibilities

You must ensure that you read, understand and comply with this policy.

The prevention, detection and reporting of bribery and other forms of corruption are the responsibility of those working for us or under our control. Employees are required to avoid any activity that might lead to or suggest a breach of this policy.

You must notify your line manager/director OR the Company Secretary as soon as possible if you believe or suspect that a conflict with or breach of this policy has occurred, or may in future.

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for gross misconduct. We reserve the right to terminate our contractual relationship with other workers or companies if they breach this policy.

5.0 Record keeping

We must keep financial records and have appropriate internal controls in place which will evidence the business reason for making payments to third parties.

Directors, Managers and Sales Staff must ensure all expenses claims relating to hospitality, gifts or expenses incurred to third parties are submitted in accordance with our expenses policy (see P9 Competition Law – Compliance) and specifically record the reason for the expenditure.

Directors, Managers and Sales Staff must confirm their compliance with this policy on the attached Gifts or Hospitality Received Reporting form (which will appear on the reverse of the expenses form). This form must be completed each month and must include a written record of all hospitality or gifts accepted or offered, which will be subject to managerial review. Where there is nothing to report enter '0' under 'Total Gifts and Hospitality received'.

All accounts, invoices and other documents/records relating to dealings with third parties, such as clients, suppliers and business contacts, should be prepared and maintained with strict accuracy and completeness. No accounts must be kept "off-book" to facilitate or conceal improper payments.

6.0 How to raise a concern

You are encouraged to raise concerns about any issue or suspicion of malpractice at the earliest possible stage. If you are unsure whether a particular act constitutes bribery or corruption, or if you have any other queries or concerns, these should be raised with your line manager/director OR the Company Secretary.

7.0 What to do if you are a victim of bribery or corruption

It is important that you tell the Company Secretary as soon as possible if you are offered a bribe by a third party, are asked to make one, suspect that this may happen in future, or believe that you are a victim of another form of unlawful activity.



8.0 Protection

Employees who refuse to accept the offer of a bribe, or those who raise concerns or report another person's wrongdoing, are sometimes worried about possible repercussions. We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken.

We are committed to ensuring no one suffers any detrimental treatment as a result of refusing to take part in bribery or corruption, or for reporting in good faith their suspicion that an actual or potential bribery or other corruption offence has taken place, or may take place in the future. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment; you should inform your line manager/director immediately. If the matter is not remedied you should raise it formally using the company's Grievance Procedure.

9.0 Training and communication

Training on this policy forms part of the induction process for new employees. Existing employees will receive regular, relevant training on how to implement and adhere to this policy. In addition, employees will be asked to formally accept conformance to this policy on an annual basis.

Our zero-tolerance approach to bribery and corruption must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and as appropriate thereafter.

10.0 Who is responsible for the policy?

The board of directors has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

The Company Secretary has primary and day-to-day responsibility for implementing this policy and for monitoring its use and effectiveness and dealing with any queries on its interpretation. Management at all levels are responsible for ensuring those reporting to them are made fully aware of and understand this policy, are given adequate and regular training on it.

Managers are responsible for ensuring that employees under their control comply with this policy and complete a reporting form where necessary.

11.0 Monitoring and review

The Company Secretary will monitor the effectiveness of this policy. The Company Secretary will also review this policy annually, considering its suitability, adequacy and effectiveness. Any improvements identified will be made as soon as possible. Internal control systems and procedures will be subject to regular audits to provide assurance that they are effective in countering bribery and corruption.

Employees are responsible for the success of this policy and should use it to disclose any suspected danger or wrongdoing.

Employees are invited to comment on this policy and suggest ways in which it may be improved. Comments, suggestions and queries should be addressed to the Company Secretary.

This policy is non – contractual and may be amended at any time.

Andrew Smith

Company Secretary

Date: 1 October 2014

Note. You are required to acknowledge your receipt and understanding of this policy by signing and returning the enclosed Compliance Form to the Company Secretary. This acknowledgement will become a permanent part of your personnel record.