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## 1. Policy statement

**1.1** It is our policy to conduct all of our business in an honest and ethical manner. We take a zero tolerance approach to any activities involving bribery and corruption and are committed to acting professionally, fairly and with integrity in all our business dealings and relationships, wherever we operate.

**1.2** We have developed and rigorously implement and enforce effective systems to counter bribery and corruption.

**1.3** We will uphold all laws relevant to countering bribery and corruption in all the jurisdictions in which we operate. However, we always remain bound by UK laws, including The Bribery Act 2010, in respect of our conduct both at home and abroad.

## 2. About this policy

The purpose of this policy is to set out our responsibilities, and of those third parties working with us and on our behalf, in observing and upholding our position on bribery and corruption;

**2.1** It is a criminal offence to offer, promise, give, request, or accept a bribe. Any Individuals found guilty can be punished by up to ten years imprisonment and/or a substantial fine.

**2.2.** As a business if we fail to prevent bribery we can also face a fine, exclusion from tendering for certain contracts, and damage to our reputation. We therefore take our legal responsibilities and our reputation very seriously.

**2.3** To address any potential risks we have:

- Allocated responsibility and accountability for all our third party relationships to senior managers and directors and we have assigned clear managerial responsibility for managing relationships with third parties;
- Taken steps to embed our anti-bribery programme into all the activities of all material activities of the Company and those of our workforce and officers;
- Examine and managing all our third party relationships;
- Integrated our approach to risk management and training and by the application of consistent standards across the Company; and
- Made a conscious decision to keep our anti bribery programme under review.

## 3. Who is responsible for our policy?

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

**3.2.** The compliance manager has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering bribery and corruption.

## 4. Your responsibilities

**4.1.** We expect all those organisations working with us to have read, understood and to comply with this policy.

**4.2.** The prevention, detection and reporting of bribery and other forms of corruption are the responsibility of all of us.

**4.3.** It is important that you contact our Compliance Manager, Chris Rowlinson, as soon as possible, if you believe or suspect that a conflict with this policy has occurred, or may occur in the future.

**4.4.** You are encouraged to raise any concerns about any issue or suspicion of bribery or corruption at the earliest possible stage. We always aim to encourage openness.