

## **ANTI-BRIBERY AND CORRUPTION POLICY**

Bribery is the offer or acceptance of a reward to persuade someone to act dishonestly or unlawfully. Under the Bribery Act 2010 employers are required to take steps to prevent bribery. The Company will take disciplinary action against any employee who is found to have committed bribery, which is listed in our disciplinary policy as an example of gross misconduct.

Our purchasing and contract management procedures will be kept under review to ensure decisions are always reached on the basis of objective evidence and the Company's business interests and not influenced inappropriately by some form of bribe or inducement.

Employees who discover or suspect acts of bribery should report this to Head Office or an appropriate senior Manager.

Employees are also required to comply with the Company's policy on acceptance of gifts and hospitality. We accept that as a gesture of appreciation it may occasionally be appropriate for employees to accept small gifts or reasonable corporate hospitality from clients, suppliers or any other person or Company with which the Company has business connections.

It is important however that no employee acts in any way that is inconsistent with the integrity of our business by accepting a gift in circumstances where it could influence, or be seen to influence, that employee's business actions or decisions. If in any doubt about the motive for offering a gift, approval should be sought from the Managing Director beforehand.

Any employee who is offered or receives a gift of any kind from an existing or potential client or business contact must disclose the nature of the gift and the identity of the sender to their Manager.

Corporate hospitality is any form of entertainment, accommodation or other hospitality provided for an employee by a third party because he or she is a representative of the Company. If in any doubt about the motive for offering such hospitality, approval should be sought from your Manager before acceptance.