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Bribery Policy

General

Any statutory rights referred to are subject to change in line with changes in legislation.

Who is covered by this Policy?

This policy applies to all "associated persons" pursuant to section 8 of the Bribery Act 2010 ("the Act"). Consequently, this policy applies to all individuals who provide services for or on behalf of the Company.

This includes but it not limited to senior managers, officers, directors, employees (including temporary and/or permanent), consultants, contractors, trainees, seconded staff, homeworkers, casual workers, agency staff, volunteers, interns, agents, sponsors and anyone associated with the Company wherever located.

The prevention, detection and reporting of bribery and other forms of corruption are the responsibility of all those working for us or under our control.

The Meaning of 'Bribery' The offence of bribery is defined in sections 1 and 2 and of the Act. It can be summarised as follows:

- Offering or giving "a financial or other advantage" to induce another to improperly perform a "relevant function or activity" or to reward them for it.
- Requesting or receiving "a financial or other advantage" in order that a "relevant function or activity" or activity is performed improperly.
- A "financial or other advantage" includes not only payments of money but also other gifts and benefits.
- An "improper performance" means actions which would breach the expectation of what a reasonable person in the UK would expect in relation to that particular activity or function.

A "relevant function or activity" is defined in wide terms. It can be summarised as follows:

Any public, business or employment related activity or function which is required to be performed in good faith or impartially or in a position of trust. This includes activities or functions which have no connection with the UK or are performed outside the UK.

For ease of understanding only, the legal definition of bribery can be simplified as 'any benefit which is given or received to induce an improper performance of a company related activity'.

Breach of this Policy

Breach of this policy will lead to disciplinary action which could result in dismissal for gross misconduct and/or termination of any contractual relationship.

Your Responsibilities

You are required to:

- Read, understand and comply with this policy.
- Avoid any activity that might lead to, or suggest a breach of this policy
- Suggest ways in which this policy and/or our compliance under the Act could be improved.
- Notify the person responsible for this policy or the Board of Directors as soon as possible if you believe or suspect that a conflict with this policy has occurred or may occur in the future. For example, if a client or potential client based in the UK or abroad offers you 'something' in order to gain a business advantage with us; or indicates to you that a gift or payment is required to secure their business.
- Declare and keep a written record of all hospitality or gifts accepted or offered. All such records will be subject to Company review.
- Ensure all expenses claims relating to hospitality, gifts or expenses incurred to third parties are submitted in accordance with Company Expenses Policy.

You (and/or someone on your behalf) **MUST NOT**:

- a) Give, promise to give, or offer, a payment, gift or hospitality with the expectation or hope that a business advantage will be received, or to reward a business advantage already given or to facilitate a government procedure.
- b) Accept payment from a third party that you know or suspect is offered with the expectation of providing a business advantage to them or providing a business advantage to the Company.
- c) Cause any detriment to another worker who has refused to commit a bribery offence or who has raised concerns under this policy.
- d) Engage in any activity that might lead to a breach of this policy.

Training, Implementation and Monitoring

Training

Employees, workers / volunteers will receive training in order that they may:

- Understand the responsibilities arising under this policy and the Act
- Facilitate the evaluation, design and implementation of anti-bribery procedures such as audit trails and risk assessments.
- Implementation
- All agents, contractors, consultants, suppliers and any business partners shall be notified:
- At the outset of our business relationship that we are committed to adhering to our obligations under this policy and/or the Act and that
- The Company reserves the right to terminate any existing or future contractual relations if it suspects any breach of this policy and/or the Act.

Monitoring

Employees / volunteers will be kept informed of the person responsible for the day-to-day monitoring and implementation of this policy.

Managers should communicate with the person responsible for this policy to ensure their teams understand this policy and are given adequate training on it. The Company's board of directors have overall responsibility for ensuring this policy complies with the Company's obligations under the Act and that all those under our control comply with it. The Company keeps financial records and has appropriate internal controls in place to evidence the business reason for making payments to third parties.