

ANTI BRIBERY AND CORRUPTION

The company does not tolerate, permit, or engage in bribery, corruption, or improper payments of any kind in our business dealings, anywhere in the world, both with the public officials and people in the private sector. Ethical behaviour is in the long term interests of our company.

We are committed to the following key Anti Bribery and Corruption principles:

- We will carry out business fairly, honestly and openly.
- We will not give or offer any money, gift, hospitality, or other advantage such as holidays to any person carrying out a business or public role, or to a third party associated with that person, or to any foreign official to get them to do something improper or influence them to our business advantage.
- We will not use intermediaries or contractors for the purpose of committing acts of bribery.
- We do not allow employees to accept money, gifts, hospitality and other advantages from business associates, actual or potential suppliers, or service providers which are intended to influence a business decision or transaction in some improper way.
- An employee found to be in breach of these principles will face disciplinary action and may be subject to up to 10 years in prison.
- No employee will suffer demotion, penalty, or adverse consequences for refusing to pay any bribes, even it may result in the company losing business.
- We will avoid doing business with others who do not commit to conducting business without bribery.
- We will have adequate procedures in place to ensure that all employees understand the implications of the Bribery Act 2010 and our procedures. We will have appropriate mechanisms in place to record any problems.

Any concerns relating to a breach of the Policy should be reported to your Line Manager, HR Manager or a Director. Where a breach of the policy is noted, this will be thoroughly investigated by a member of the Board who is not directly responsible for the individual under investigation. Where a conflict still may exist, a senior member of the Management team from our parent company will be engaged to carry out the investigation. This will be facilitated by the Managing Director. We will ensure that this policy is pursued throughout the organisation and will give full backing to the SHEQ Team whose function it shall be to monitor and report on its implementation. This Policy shall be communicated to all employees and any amendments will be brought to their attention via their line management.

This policy will be reviewed at a frequency of no less than annually.



Signed.....
Tim O'Connor - Managing Director

Date: 26/06/19