



It is the Policy of the Company to ensure that our business is conducted according to ethical, professional and legal standards in a fair, honest and open manner.

The Company has a zero-tolerance approach to all forms of bribery and corruption which include:

- The direct or indirect promise, offering or authorisation of anything of value;
- The offer or receipt of any kickback, loan, fee, reward or other advantage;
- The giving of aid, donations or voting designed to exert improper influence;
- Payments for lavish or inappropriate entertainment or travel;
- Favours including offers of employment;
- Facilitation payments;
- Inflated commissions;
- Fake consultancy agreements.

The Company opposes all forms of bribery and corruption, large as well as small, whether initiated by corrupt officials or corrupt companies or individuals, and whether it takes place in the public or private sector, in the UK or abroad.

To adhere to the policy, the Company will:

- Ensure all Company personnel are informed of the Company Policy on anti-bribery and corruption.
- Encourage employees, subcontractors and business partners to report any suspicions of bribery and/or corruption through formal 'whistle blowing' channels or more informally through our Company 'open door' policy which enables any individuals to discuss any concerns they may have with senior management in a confidential environment;
- Have an understanding of how bribery may occur during the Company's operations and the impacts this could have, implementing appropriate control measures as necessary to prevent occurrence;
- Use appropriate disciplinary and other sanctions for violations of the policy and/or laws against bribery and corruption.
- Constantly monitor and regularly review this Anti-Bribery and Corruption Policy in order to ensure its continuing suitability.
- Undertake monitoring of employee expenses records to ascertain any anomalies which may fall into the scope of this Policy.
- Provide copies of this Anti-Bribery and Corruption Policy Statement to all employees.

Failure to comply with this policy may result in disciplinary action, including dismissal or appropriate sanctions, in addition to civil and criminal charges.

Paul Jordon
Managing Director
July 2022