



# Bribery & Corruption Policy

Department: Human Resources

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## **Bribery and Corruption Policy**

1. (a) The Company is fundamentally opposed to any acts of bribery and to the making of facilitation payments as defined by the Bribery Act 2010.
2. (b) Employees and any other persons associated with the Company such as agents, subsidiaries and business partners are not permitted to either offer or receive any type of bribe and/or facilitation payment.
3. (c) All employees are encouraged to report any suspicion of corruption or bribery within the Company in accordance with the Whistleblowing Policy.
4. (d) Should any employee or associated person be in doubt when receiving or issuing gifts and hospitality they must refer the issue to senior management.
5. (e) The Company uses its reasonable endeavors to implement the guidance principles on bribery management that are published, from time to time, by Secretary of State in accordance with Section 9 of the Bribery Act 2010.
6. (f) If an employee or associated person is found guilty of giving or receiving a bribe, he/she will be personally criminally liable and may be subject to disciplinary action.
7. (g) Anyone found guilty of bribery, will be responsible for bearing any related remedial costs such as losses, court fees or expenses.

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