



Underwater Connectivity

ANTI-CORRUPTION CODE

Corruption is damaging to business and to society, and may result in criminal and civil liability for organisations and individuals.

Our Principle

We will not engage in, facilitate or condone any form of corruption, either directly or through any third party.

What We Mean

“Corruption” includes bribery, extortion, fraud, deception, collusion, cartels, abuse of power, embezzlement, trading in influence, money-laundering and similar criminal activity.

We prohibit our officers and employees from engaging in, facilitating or condoning any form of corruption.

We implement procedures which are designed to ensure that:

- we do not engage in, facilitate or condone any form of corruption in our business dealings;
- none of our clients, business partners, sub-contractors, suppliers and consultants commits a corrupt act against us.

We notify our sub-contractors, suppliers and consultants of this Code, and require them to adopt it and implement it in their business dealings with us.

We require our officers and employees to report immediately to the Managing Director any suspicion of corrupt behaviour.

We will investigate any suspicion of corruption and take appropriate action to deal with it.

In order to minimise the opportunity for corruption, we have implemented a policy in relation to gifts and hospitality, and political or charitable donations, which limits the amounts which can be given or received, and which requires them to be recorded in a register which is routinely inspected.

R MAIR

Managing Director

05 September 2017

Next review date: 04 September 2018