



## ANTI-CORRUPTION CODE

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

<b>Our Principle</b>	<b>We will not engage in, facilitate or condone any form of corruption, either directly or through any third party.</b>
<b>What We Mean</b>	<p>“Corruption” includes bribery, extortion, fraud, deception, collusion, cartels, abuse of power, embezzlement, trading in influence, money-laundering and similar criminal activity.</p> <p>We prohibit our officers and employees from engaging in, facilitating or condoning any form of corruption.</p> <p>We implement procedures which are designed to ensure that:</p> <ul style="list-style-type: none"><li>• we do not engage in, facilitate or condone any form of corruption in our business dealings;</li><li>• none of our clients, business partners, sub-contractors, suppliers and consultants commits a corrupt act against us.</li></ul> <p>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.</p> <p>We require our officers and employees to report immediately to the Managing Director any suspicion of corrupt behaviour.</p> <p>We will investigate any suspicion of corruption and take appropriate action to deal with it.</p> <p>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.</p>

A handwritten signature in blue ink, appearing to read 'R MAIR', is written over a light blue horizontal line.

**R MAIR**  
Managing Director  
3 September 2019

Next review date: 2 September 2020