1. Purpose

- 1.1 <<Company Name responsible corpora and other requirement
- 1.2 The Company is fu and is fully commit legislation including ensures that no bril made, offered, soug

2. Bribery

- 2.1 Bribery is defined a to another party wh perform a particula where the acceptan
- 2.2 Bribery is also deen a financial or other intended to induce t the acceptance of t party acts improper
- 2.3 Bribery of a foreign or other advantage business or an adva is required or permi

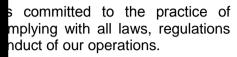
3. Consequences of Bribery

- 3.1 Anyone or any org fines and/or prison are likely to result fr
- 3.2 For employees of t the Act may result in
 - 3.2.1 disciplinary
 - 3.2.2 criminal per imprisonmer
- 3.3 For the Company, associate may resu
 - 3.3.1 the Compan
 - 3.3.2 the Compan
 - 3.3.3 the Compa damage as a









g a strong anti-corruption culture all anti-bribery and anti-corruption Bribery Act 2010 ("the Act") and ments, inducements or similar are nyone working on our behalf.

of a financial or other advantage ended to induce the other party to o reward them for the same, or itself improper conduct.

arty requests or agrees to receive er party where that advantage is rticular function improperly, where f improper conduct, or where that advantage.

giving or promising of a financial ience the official in order to obtain ousiness unless the foreign official ed by such advantage.

bribery under the Act may face legal costs and adverse publicity

omply with this Policy and/or with

dismissal; and

hich may result in a fine and/or

cy by any employee or business

breach of the Act;

and

oublicity and further associated

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4. Responsibility for Compl

- 4.1 This Policy applies consultants, busine partnerships and bo subsidiaries.
- 4.2 It is the responsib bribery is prevente made in accordar otherwise stated in
- 4.3 No party described
 - 4.3.1 give or pron use a third p advantage is function imp acceptance
 - 4.3.2 request or a another part performance advantage recipient inte
- 4.4 Parties described in
 - 4.4.1 be aware ar Policy and ir
 - 4.4.2 exercise due behalf of the
 - 4.4.3 report any a line manage contact with Company's

5. Facilitation Payments

- 5.1 A facilitation payme to ensure or speed
- 5.2 Facilitation paymen made at any time territories.
- 5.3 Facilitation or simila your life is in dang made must be re reasonably possible

6. Gifts and Hospitality

6.1 Gifts and hospitalii should be provide

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icy

ents, contractors, subcontractors, her parties (including individuals, ed with the Company or any of its

mentioned parties to ensure that d and all such reports should be 's Whistleblowing Policy or as e.

er advantage to another party (or the Company's behalf where that other party to perform a particular m for the same, or where the tself constitute improper conduct;

hancial or other advantage from is intended to induce the improper n, where the acceptance of that improper conduct, or where the anticipation of such an advantage.

bribery risks as described in this ection 9 below;

when dealing with third parties on

o bribery to <<insert position, e.g. n-employees, their normal point of herwise in accordance with the

bayment made to officials in order utine or necessary functions.

subject to section 5.3, may not be ng business customs in certain

te in limited circumstances where circumstances. Any payment so son / position>> as soon as is

bart of conducting business and with the Company's Gifts and









Hospitality Policy.

- 6.2 Gifts and hospitality of interest. Care a giving or receiving a
- 6.3 The following gener
 - 6.3.1 Gifts and he inducements inappropriate
 - 6.3.2 Neither gifts from any pa any busines on gifts or ho
 - 6.3.3 Cash shoul circumstance
 - 6.3.4 Gifts and he avoided at the second sec
 - 6.3.5 The value of be proportio unusually hi our industry
 - 6.3.6 Certain gifts the Hospitali significant a any gifts ac position>> c
 - 6.3.7 All gifts and the Hospitali

7. Charitable Donations

- 7.1 Charitable donation charitable donation registered charity.
- 7.2 All charitable donat etc.>>.
- 7.3 Proof of receipt of a organisation.
- 7.4 Under no circumsta
- 7.5 No charitable dona donation may result

8. Political Donations

8.1 The Company doe affiliated with any organisation whose

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constitute a bribe and/or a conflict be exercised at all times when lity on behalf of the Company.

given nor received as rewards, for preferential treatment or

be actively sought or encouraged ession be given that the award of nilar will be in any way conditional

received as a gift under any

vant parties should be generally tendered or awarded.

whether given or received, should ich they relate and should not be mpared to prevailing practices in

be in breach of this Policy and/or be accepted if refusal would cause owever the Company will donate to a charity of <<insert person /

n or received, must be recorded in

gistered (non-profit) charities. No ny organisation which is not a

ded in <<insert register / system

ust be obtained from the recipient

ations be made in cash.

e request of any party where that

nations and the Company is not ent candidate, or with any other plitical.









8.2 Employees and oth provided such pay Company and are r transaction.

9. Due Diligence and Risks

The following issues shou dealings with officials, and

- 9.1 Territorial risks, pa particular country;
- 9.2 Cross-border paym section 9.1;
- 9.3 Requests for cash methods of paymen
- 9.4 Activities requiring permits or other form
- 9.5 Transactions involvi
- 9.6 [<<Insert additional

This policy has been approved a	
Name:	< <insert< th=""></insert<>
Position:	< <insert< th=""></insert<>
Date:	< <date></date>

Signature:



free to make personal donations d to be made on behalf of the orm of advantage in any business

care in any and all transactions, oncerning third parties:

e of bribery and corruption in a

involving territories falling under

sh intermediaries or other unusual

any associated party to obtain n; f goods;

rces Manager>>