

## Bribery Policy Statement

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Applies to Bribery Act 2010

All persons working on behalf of S + B under no circumstances are allowed to use bribery on S + B behalf.

Note Hospitality is not prohibited by the act – All hospitality needs to be either authorized or within agreed company standards

### Definition

Giving someone a financial or other advantage to encourage a person to perform their function or activities improperly or to reward that person for already having done so.

So this could cover seeking to influence a decision maker (either internally or externally) by giving some kind of extra benefit to that decision maker rather than by what can be legitimately be offered as part of a tender process

### Scope

This Policy applies to all employees, officers, consultants and contractors of the Company. In addition this Policy also applies to all agents, representatives or other third party intermediaries providing services.

### Policy

We will never offer, pay, solicit or accept bribes in any form, either directly or indirectly. We will not participate in any kind of corrupt activity, either directly or through any third party.

We will take disciplinary action against employees who are found to be giving or taking bribes or who offer, promise or give any improper or corrupt financial or other advantage. This may lead to dismissal or termination of employment and, if appropriate, criminal proceedings.

We will terminate business relationships with any agent or third party representative that violates any provision of this Policy.

We will not

We will not take part in any bribery or corrupt behaviour or activity or allow others to do so, on behalf of the Company.

We will not give, receive, ask for or permit anyone else to give bribes or engage in any corrupt activities to win new business, retain business or otherwise secure the Company any form of improper business advantage.

We will not choose agents or third party representatives who contravene our standards and any applicable regulatory requirements.

We will not pay more than a fair market price for goods and services.

We will not pay any form of facilitation or enabling payments to speed up or otherwise procure a transaction. These are the same as bribes.

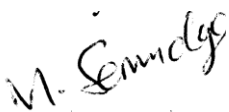
We will not hide or fail to record properly our activities, or falsify any company records or accounts.

### Responsibilities

All persons are responsible for ensuring you do not participate in such negotiations and reporting of any suspicions you may have in the first instance to your line manager for further investigation in the strictest of confidence

Examples

- Illegal payments made or offered to third parties
- In-appropriate use of expenses incurred carrying out your duties
- Accepting any form of gift not necessary in completing your role within the business
- Bribery in any kind used to influence a decision maker
- Miss-use of company funds



Signed:

Managing Director

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