

ANTI-BRIBERY & CORRUPTION POLICY

Alderton Associates Ltd

It is the Policy of Alderton Associates Ltd to ensure that our business is conducted according to ethical, professional and legal standards in a fair, honest and open manner.

The Company has a zero-tolerance approach to all forms of bribery and corruption which include:

- The direct or indirect promise, offering or authorisation of anything of value;
- The offer or receipt of any kickback, loan, fee, reward or other advantage;
- The giving of aid, donations or voting designed to exert improper influence;
- Payments for lavish or inappropriate entertainment or travel;
- Favours including offers of employment;
- Facilitation payments;
- Inflated commissions;
- Fake consultancy agreements.

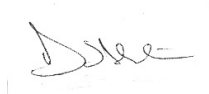
Alderton Associates Ltd opposes all forms of bribery and corruption, large as well as small, whether initiated by corrupt officials or corrupt companies or individuals, and whether it takes place in the public or private sector, in the UK or abroad.

To adhere to the policy, we will:

- Ensure all Company personnel are provided with training on the Company Policy on anti-bribery and corruption so they can recognise the signs and take steps to avoid it;
- Encourage employees, subcontractors and business partners to report any suspicions of bribery and/or corruption through formal 'whistle blowing' channels or more informally through our Company 'open door' policy which enables any individuals to discuss any concerns they may have with senior management in a confidential environment;
- Have an understanding of how bribery may occur during the Company's operations and the impacts this could have, implementing appropriate control measures as necessary to prevent occurrence;
- Use appropriate disciplinary and other sanctions for violations of the policy and/or laws against bribery and corruption.
- Constantly monitor and regularly review this Anti-Bribery and Corruption Policy in order to ensure its continuing suitability.
- Undertake monitoring of employee expenses records to ascertain any anomalies which may fall into the scope of this Policy.
- Provide copies of this Anti-Bribery and Corruption Policy Statement to all employees.

Failure to comply with this policy may result in disciplinary action, including dismissal or appropriate sanctions, in addition to civil and criminal charges.

Signed:



Danny Alderton
Alderton Associates Ltd
3rd November 2018

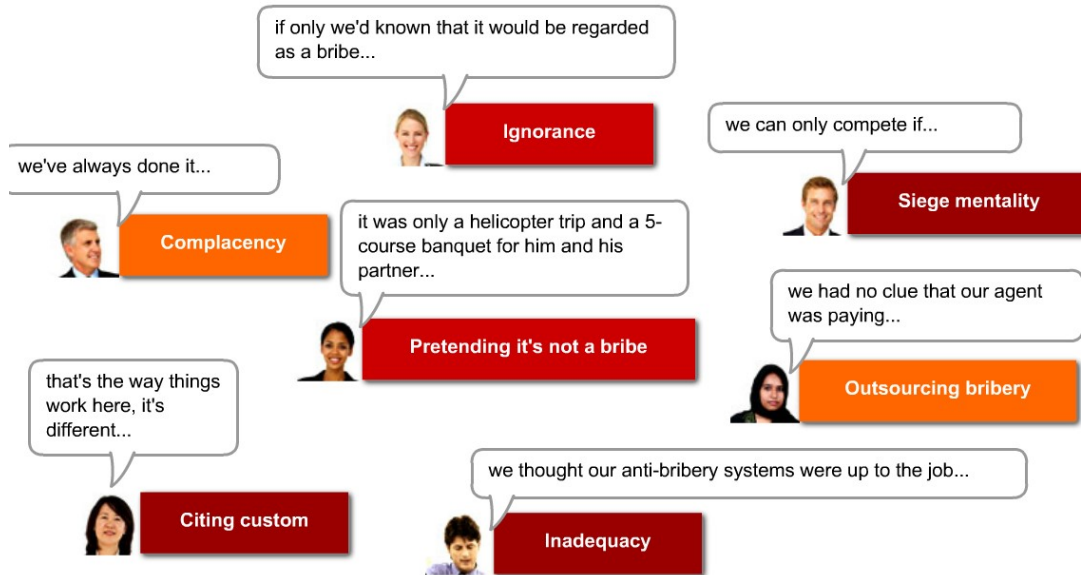
ANTI-BRIBERY & CORRUPTION TRAINING

Reason Employers and employees must know their own and others legal duties.

Why You cannot comply with the law if you are not aware of what it says.

Subjects covered:

- ✓ What is Bribery?
- ✓ Company Anti-Bribery and Corruption Policy
- ✓ Individual responsibilities
- ✓ How to report



Source: http://dbwb.e-learningportal.com/untracked/Doing_Business_Without_Bribery/start.htm

Bribery is:

"The offering, giving, receiving, or soliciting of any item of value or an advantage to another person to induce that person to improperly perform a relevant function or activity, or to reward them for improper performance".

Inducements can take the form of, gifts, loans, fees, rewards, or other advantages (taxes, services, donations, etc).

Individual responsibilities:

- × Do not take payments
- × Do not offer bribes, payments or incentives

How to report:

- ✓ Raise any issues or concerns with your line manager at any time.

REMEMBER:

Companies or individuals that breach legislation (The Bribery Act) will face criminal penalties, including possible unlimited fines and jail sentences of up to ten years.

ATTENDANCE REGISTER

Location / Site Address:	
Date:	
Name of person providing briefing:	
Job title:	

I acknowledge I have received a briefing on Anti-Bribery and Corruption			
NAME (PRINT)	SIGNATURE	NAME (PRINT)	SIGNATURE