

Anti-Bribery and Corruption

Statement of Commitment

The Group is committed to conducting business in a fair and honest manner in compliance with any internal policies and procedures and in accordance with external legislation, rules and regulations. It is the aim of the Group to ensure that its commitment to how it conducts its business pervades all areas of its business, regardless of scope or territorial boundaries and jurisdictions. The Group acknowledges the importance and value of its colleagues to ensuring that this commitment is enforced and implemented in all of the Group's activities.

Zero Tolerance

We have a zero-tolerance approach to bribery and other forms of corruption and our policies are designed to ensure compliance with relevant laws wherever we do business.

Principles

The Group's anti-bribery policy is designed around the need to uphold and embody the following principles:

1. Adopt proportionate procedures to ensure that the Group and its individuals comply with its potential exposure and liability under the Bribery Act 2010 and associated legislation. Such procedures are specific to the Group's sphere of operation.
2. Commitment to conducting business in a fair and honest manner in accordance with internal controls and external regulation.
3. Accurate identification and assessment of potential risk areas for corruption and bribery within the Group.
4. Carrying out appropriate and proportionate due diligence in all areas of activity prior to entering into a commitment.
5. Appropriate training and communication of the bribery and corruption risks associated with carrying on the Group's business to all employees, partners, consultants and relevant third-party suppliers acting on behalf of the Group.
6. Continuous monitoring, reviewing and testing of the Group's anti-bribery policy to ensure continuous oversight of the policy and procedures.

John Humphrey
Group Company Secretary
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