

ANTI BRIBERY AND CORRUPTION POLICY

Introduction

Seymour & Castle Ltd values its reputation for ethical behaviour and for financial probity and reliability. It recognises that over and above the commission of any crime, any involvement in bribery will also reflect adversely on its image and reputation.

It is our policy to conduct all of our business in an honest and ethical manner. We take a zero tolerance approach to bribery and corruption and are committed to acting professionally, fairly and with integrity in all our business dealings and relationships wherever we operate and implementing and enforcing effective systems to counter bribery.

We will uphold all laws relevant to countering bribery and corruption in all the jurisdictions in which we operate. However, we remain bound by English law, including the Bribery Act 2010, in respect of our conduct both at home and abroad. The act came into force on 1 July 2011, if found guilty carries a maximum of 10 years' imprisonment and unlimited fine.

This Policy applies to all individuals working at all levels and grades, including senior managers, officers, Directors, employees (whether permanent, fixed-term or temporary), consultants, contractors, sub contractors, apprentices, seconded staff, casual workers and agency staff, agents, or any other person associated with us, or any of our subsidiaries or their employees, wherever located (collectively referred to as **workers** in this Policy).

It is the responsibility of all concerned to read, understand and comply with this policy

The companies aim therefore is to limit its exposure to bribery and corruption by:

- Setting out a clear anti-bribery & corruption policy;
- Training of employees so that they can recognise and avoid the use of bribery by themselves and others;
- Encouraging its employees to be vigilant and to report any suspicion of bribery or corruption, providing them with suitable channels of communication and ensuring sensitive information is treated appropriately;
- Rigorously investigating instances of alleged bribery and assisting the police and other appropriate authorities in any resultant prosecution;
- Taking firm and vigorous action against any individual(s) involved in bribery.

Anti Bribery & Corruption Policy

The company has a **zero tolerance** policy towards any incidents of Bribery and Corruption and will report any suspected offences to the police or other appropriate prosecuting authority.

The company prohibits:

The offering, the giving, the solicitation or the acceptance of any bribe, whether cash or other inducement to or from any person or company, wherever they are situated and whether they are a public official or body or private person or company by any individual employee, agent or other person or body acting on the companies' behalf in order to gain any commercial,

contractual or regulatory advantage for Seymour & Castle Ltd in a way which is unethical or in order to gain any personal advantage, pecuniary or otherwise, for the individual or anyone connected with the individual.

Further Clarification

This policy prohibits any inducement which results in a personal gain or advantage to the recipient or any person or body associated with them, and which is intended to influence them to take action which may not be solely in the interests of the company or of the person or body employing them or whom they represent.

This policy is not meant to prohibit the following practices providing they are proportionate and are properly recorded, the hospitality form must be completed and returned to be included in the register;

- Normal and appropriate hospitality as defined by the company hospitality and gifts policy.
- The giving of a ceremonial gift on a festival or at another special time.
- The offer of resources to assist the person or body to make the decision more efficiently provided that they are supplied for that purpose only.

Inevitably, decisions as to what is acceptable may not always be easy. If anyone is in doubt as to whether a potential act constitutes bribery, the matter should be referred to the Fraud Manager before proceeding. If necessary, guidance should also be sought from any member of the Management Team.

Employee Responsibility

The prevention, detection and reporting of bribery is the responsibility of all employees throughout the company. Suitable channels of communication by which employees or others can report confidentially any suspicion of bribery will be maintained by confidential communication to any Director or Manager.

The H&S manager has primary and day-to-day responsibility for implementing this Policy and for monitoring its use and effectiveness and dealing with any queries on its interpretation. Management at all levels are responsible for ensuring those

reporting to them is made aware of and understands this Policy and are given adequate and regular training on it.

The H&S manager will monitor the effectiveness and review the implementation of this Policy, regularly considering its suitability, adequacy and effectiveness. Any improvements identified will be made as soon as possible. Internal control systems and procedures will be subject to regular audits to provide assurance that they are effective in countering bribery and corruption. All hospitality is to be recorded on the correct forms and included on the register

Supporting Documentation

This policy is supported by the following documents:

- Hospitality register
- Business Ethics Policy
- Fraud Policy Statement

