



## Bribery and Corruption

It is William Hands policy to conduct all 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. Implementing and enforcing effective systems to counter bribery.

We will uphold all laws relevant to countering Bribery and Corruption in all areas in which we operate. However, we remain bound by the laws of the UK, including the Bribery Act 2010 in respect of our conduct both at home and abroad.

This policy applies to all permanent and fixed-term staff employed by the Company, and any contractors, consultants or other persons acting under or on behalf of the Company.

The Company will not:

- Make contributions of any kind with the purpose of gaining any commercial advantage.
- Provide gifts or hospitality with the intention of persuading anyone to act improperly, or to influence a public official in the performance of their duties.
- Make, or accept, “kickbacks” of any kind.

Employees will not:

- Accept, request or offer any financial or other reward from any person in return for providing some favour.

The Company will encourage employees to raise concerns about any issue or suspicion of malpractice at the earliest possible stage.

All employees have a role to play in enforcing the policy and are required to deal with any observed or reported breaches. Should employees feel apprehensive about their own safety in regard to addressing any breach, they should seek senior management support.

Any member of staff refusing to observe the policy will be liable to disciplinary action in accordance with the Company’s Disciplinary Policy up to and including dismissal.

Overall responsibility for policy implementation and review rests with senior management

Signed:

Position: CEO

Date: 12<sup>th</sup> December 2018