

ANTI-BRIBERY AND ANTI-CORRUPTION POLICY

It is a violation of the Law for any employee of the Company to offer or receive a bribe, gratuity or any other improper payment in order to achieve a desired business result.

Providing or receiving a bribe or any other improper payment may constitute an unfair business practice and therefore may be illegal.

Bribery is prohibited when dealing with any person whether they are in the public or private sector. Any questions regarding the application of this portion of the Code should be directed to Management.

When dealing with vendors or representatives of any company, no employee may extend or receive a gratuity or any other improper payment to influence the placement of business.

This prohibition extends to the provision or receipt of free or compensating services for which the recipient would normally incur an expense.

Provision or receipt, of free services may create an actual conflict of interest and may seem inappropriate, even if completely innocent in nature.

Offers of such a gratuity, or free services must be reported to Senior Management as soon as practically possible.



Mark Humphreys
Managing Director