

Anti Bribery Policy*

R7M-QMS-DOC-003 Rev C3
(Dated at Signature)



Bribery & Corruption Policy

The Company recognises that bribery and corruption have an adverse effect on business and communities in which they operate in. Failure to identify and act upon bribery or corruption can break laws and basic human freedoms, distorting free trade and competition. The Company definitions of bribery and corruption are below;

Bribery - The act of taking or receiving something with the intention of influencing the recipient in some way favourable to the party providing the bribe.

Corruption - Giving or obtaining advantage through means which are illegitimate, immoral, and/or inconsistent with one's duty or the rights of others.

The Company's Statement

The Company will not tolerate any form of Bribery or Corruption and seeks to act with honesty and integrity in all of its business dealings. The Company will immediately and thoroughly investigate any allegation of bribery or corruption, and will take the strongest action. Breaches of this policy may be considered to be gross misconduct.

Laws and Regulations

The Company is committed to applying high standards of honesty and integrity across our business. Our Bribery and Corruption Policy mirrors the statutory requirements applicable in the UK under the Bribery Act 2010.

Policy and Practices

The Company's Bribery and Corruption Policy applies to all employees, agency workers, consultants and contractors, irrespective of their level or functions they perform within the Company.

The Company expects our business partners, suppliers and contractors to act with utmost integrity and without actions or thoughts involving bribery and/or corruption.

Responsibilities

All employees, consultants, contractors and agency workers; and any individual working directly for the business (including agents) are required and agree to operate within the following guidelines:

- To always act with honesty and integrity and support the Company's policy relating to bribery and corruption.
- Not to offer or make any bribe, outlandish or unauthorised payment or incentive of any kind to anyone.
- Not to solicit business by offering any bribe, unorthodox or unofficial payment to clients or potential clients.
- Not to accept any kind of bribe, unorthodox or unusual payment or inducement that would not be authorised by the Company in the ordinary course of business.
- To refuse any bribe or outlandish payment and to do so in a manner that is not open to misunderstanding or giving rise to false expectation; and to report any such offers.
- Not to make facilitation payments. These are payments used by businesses or individuals to secure or accelerate a service or product. The Company will not tolerate or overlook such payments being made.
- To report any breaches of the policy, if you suspect Bribery or Corruption is occurring or has occurred previously or if you are unclear on procedures or your responsibilities.

What to do if you become aware or suspect there is breach of the policy

If you become aware of (or suspect) Bribery or Corruption occurring you should report this to your Manager or an authorised Manager without delay.

This policy should be read alongside your individual contract of employment.

Any breach of policy by any employee will be considered as grounds for disciplinary action, and may be considered to be gross misconduct. A breach by a contractor or consultant will be considered grounds to terminate any contract or agreement with that individual or Company.

***This policy has been taken from the Red7Marine yourHR website and will be updated as required by the yourHR management on change of legislation or Company requirement.**

Kristen Branford
Managing Director

Date:

A handwritten signature in blue ink, appearing to be "KB", with the date "18/13/19" written below it.

(to be reviewed within 12 months of date signed)