

Entwistle Thorpe & Company Limited

ANTI-BRIBERY POLICY

Introduction

The Company values its reputation for ethical behaviour and recognises that trust and confidence in the propriety of its activities is essential to its continuing success. It is important that the Company, its employees and agents behave, and are seen to behave appropriately and honestly at all times. The Company therefore aims to limit its risk of exposure to bribery by:

- Setting out a clear anti-bribery policy
- Training all employees so that they may recognise and avoid the use of bribery
- Encouraging its employees to report any suspicion of bribery [The company will provide appropriate means of communication]
- Taking appropriate disciplinary action against any individuals found to be involved in bribery

The anti-bribery policy aims to:

- Protect the reputation of the Company
- Protect employees and agents of the Company from accusations of impropriety
- Ensure that all customers and suppliers are dealt with on an equal basis

The Policy

The Company Prohibits:

the giving, the offering, the solicitation, or the acceptance of any cash, gifts, hospitality or other inducement or favour;

to or from:

any public or government body, public or government official, any company, firm, business or private individual; whether they are situated in the UK, or any other jurisdiction;

by: any employee, agent, or any other business or individual acting on behalf of the Company;

with the intention of: acquiring contractual or commercial advantage for the Company, or personal gain for the individual concerned, or anyone connected with the individual

and said activity will be considered by the Company as a bribe and contrary to this policy

Notes:

The Company recognises the importance of good relationships with both customers and suppliers, and this policy is not intended to prevent the giving and receiving of normal and appropriate hospitality, or the giving and receiving of token gifts. If any employee or individual is in doubt as the acceptability of any item then the matter should be referred to the Finance Director.

Consequences of Breach of this Policy:

The Company considers that compliance with this policy is essential to the protection of the Company's reputation and that of its employees, agents and representatives. Breach of this policy could leave the Company open to prosecution. Therefore any employee who is found to have acted in breach of this policy or its aims may be subject to disciplinary action including summary dismissal where the breach amounts to gross misconduct.

Reporting of bribes

Any employee who suspects he may be the target of attempted bribery, or who suspects a work colleague of taking part in a bribe, is under a duty to report his concerns to the Finance Director. Such report will be dealt with as a highly confidential matter. However employees should also be aware that any deliberately malicious reports will become the subject of disciplinary action.