



ANTI-BRIBERY POLICY OF ADVANCED ENGINEERING LTD

1 INTRODUCTION

Advanced Engineering Ltd. (“the Company”) is committed to instilling a strong anti-corruption culture and to upholding all laws relevant to countering bribery and corruption, including, but not limited to, the Bribery Act 2010.

2 SCOPE AND PURPOSE

This policy applies to all employees and any other parties associated with the Company. Its purpose is to help all employees recognize and deal responsibly with bribery and corruption issues and provide information and guidance on the Company’s position.

3 BRIBERY

A bribe is an inducement offered, promised or provided in order to gain any commercial or personal advantage. The Company expressly prohibits the offering, requesting or acceptance of any bribe, whether cash or in kind to or from any person or any other party, by any employee or any other party acting on the Company’s behalf in order to gain any advantage for the Company in a way which is unethical or in order to gain any personal advantage, financial or otherwise, for the individual or anyone connected with the individual.

4 RESPONSIBILITY

4.1 It is the responsibility of all employees and any other parties associated with the Company:

4.1.1 to ensure that this policy is read, understood and complied with;

4.1.2 to prevent, detect and report any acts or suspected acts of bribery or corruption;

4.1.3 to avoid any activity that might lead to or suggest a breach of this policy;

4.1.4 to exercise due diligence at all times when dealing with any third parties on behalf of the Company.

4.2 Employees and any other parties must notify the Chairman as soon as possible if they believe or suspect that a conflict with this policy has occurred or may occur.

4.3 Any breach of this policy will be dealt with by the Company’s disciplinary procedure and could result in dismissal for gross misconduct.

5 RECORD KEEPING

The Company will keep financial records and have appropriate internal controls in place which will evidence the business reason for making payments to third parties. All accounts, invoices, memoranda and other documents and records relating to dealings with third parties will be prepared and maintained with strict accuracy and completeness. All parties are expected to:

- declare and keep a written record of all hospitality or gifts offered or accepted, of more than £50 which will be subject to managerial review;
- ensure all expenses claims relating to hospitality, gifts or expenses incurred to third parties are submitted in accordance with the Company's expenses policy and specifically record the reason for the expenditure.

6 FACILITATION PAYMENTS

- 6.1 Facilitation payments are small payments made to secure or speed up routine actions, usually by public officials, such as issuing permits, immigration controls, providing services or releasing goods held in customs. The Company will work to ensure that employees and any other parties associated with the Company do not make facilitation payments on the Company's behalf.
- 6.2 Facilitation payments constitute bribes and, subject to clause 6.3, may not be made at any time irrespective of prevailing business customs in certain territories.
- 6.3 If the demand for a facilitation payment is accompanied by threat of physical harm then put safety first, make the payment and then report immediately to the Chairman and in the case of non-employees, their normal point of contact within the Company, the circumstances and amount of the payment.

7 GIFTS, HOSPITALITY AND EXPENSES

- 7.1 Genuine hospitality or similar business expenditure that is reasonable and proportionate such as lunch or dinner is allowed provided that the hospitality or expense complies with the criteria outlined in clause 7.3 below. If the invitation includes entertainment, this will need permission from your line manager before you accept.
- 7.2 Gifts and hospitality can, when excessive, constitute a bribe and care and due diligence should be exercised at all times when giving or receiving any form of gift or hospitality on behalf of the Company. No gifts with a value of more than £50 may be given or accepted without seeking permission from your line manager.
- 7.3 The following criteria should be used to test if gifts, hospitality or expenses comply with the Company's anti-bribery policy:
- made as an act of appreciation, for a bona fide business purpose;
 - does not place the recipient under any obligation;
 - does not create expectations;
 - made openly;
 - reasonable value (no more than £50) and accords with general business practice. Cash must never be given or received as a gift under any circumstances;
 - is appropriate to the relationship and accords with general business practice;

- is legal and complies with relevant laws;
- recorded and reported;
- documented and approved.

8 POLITICAL AND CHARITABLE DONATIONS

8.1 The Company does not make contributions of any kind to political parties. No charitable donations will be made by the Company for the purpose of gaining any commercial advantage.

9 TRAINING

9.1 Training on this policy will form part of the induction process. Existing employees will receive regular and relevant training on this policy when required.

9.2 All employees and any other parties associated with the Company are responsible for the success of this policy and should use it to disclose any suspected danger or wrongdoing.

10 MONITORING AND REVIEW

The Company will monitor and review this policy regularly to ensure its effectiveness. Comments and suggestions to improve the policy and its effectiveness are welcome.