

INGLIS PM

ANTI - BRIBERY AND CORRUPTION POLICY

Inglis PM as an organisation acknowledges that bribery and corruption in any form undermines democracy, the rule of law and poses a very serious threat to sustained economic progress.

This document sets out the rules of Inglis PM in relation to Anti-Bribery and Corruption matters in the United Kingdom.

Compliance with the company's policy in relation to bribery and corruption is regarded as part of our employee contract of employment. Should you as an employee for any reason fail to follow the procedures set out in this document, action may be taken against you, which may result in dismissal.

Bribery is the offer or receipt of any gift, loan, payment, reward or other advantage to or from any person as an encouragement to do something which is dishonest, illegal or a breach of trust, whilst acting in the engagement of the company's business.

Corruption is the misuse of entrusted power for personal gain.

To place this into context you should be aware that, should you engage in activities which are contrary to UK anti-bribery and corruption legislation as dictated in the Bribery Act 2010, you could face up to 10 years in prison and/or an unlimited fine.

The company may also be liable to an unlimited fine and Government sanction should it be determined that the company did not effectively act to prevent such acts.

Inglis PM brings the following extract to the attention of its employees:

A commercial organisation commits a criminal offence under section 7 of the Bribery Act 2010 (which will come into force on 1 July 2011) if it fails to prevent bribery that is intended to obtain or retain business, or an advantage in the conduct of business, for the organisation. An organisation will have a defence to this corporate offence if it can show that it had in place "adequate procedures" designed to prevent bribery by or of person associated with the organisation.

This policy document is not regarded as exhaustive, but sets out the guidelines and procedures which should be followed.

If you are at any time uncertain as to whether your actions will comply with this policy, you must seek guidance from the Managing Director.

Inglis PM expects that you should at all times, act in accordance with the following provisions:

- Behave honestly, be trustworthy and set a good example.
- Use the resources of the company in the best interests of the company and do not misuse those resources.
- Make a clear distinction between the interests of Inglis PM and your private interests to avoid any conflict of interest, and if such conflict does arise you should report it to the Managing Director immediately.
- Ensure that any community support, sponsorship and charitable donations do not constitute bribery, and if in doubt you should consult the Managing Director.
- Confidentially report all incidents, risks and issues which are contrary to this policy document to the Managing Director.
- Raise any issues regarding anti-bribery and corruption laws and the company's policies. Queries will be dealt with anonymously and a written response will be issued.

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- Do not offer or accept bribes.

Gifts such as flowers, vouchers, food and drink are deemed to be presents. Event and travel tickets given to you as an individual are also gifts when they are not to be used in a hosted business context.

Hospitality includes invitations to hosted meals, receptions and events for business purposes.

Do not offer money to any public officials in order to speed up service or gain improper advantage. This type of bribery is a 'facilitation payment' and is illegal.

If you are faced with a demand for a facilitation payment you must:

1. Actively resist the payment.
2. Inform the Managing Director.

The UK anti- bribery and corruption legislation applies to all activities of a UK-based business no matter where they are carried out in the world. This policy therefore applies to ALL activities worldwide, whatever the local law, practice or custom may be.

By complying with this policy document we aim to ensure that you as an employee and the company do not at any time knowingly breach any relevant anti-bribery and corruption legislation and, that by adhering to the policy our company shall demonstrate that it has adequate procedures in place to prevent such activity.

You as an employee have a moral and independent obligation to prevent bribery and corruption within the company and, to ensure that any interaction with others whilst conducting the company business complies with this policy document and relevant laws.

This policy will be reviewed on an annual basis by the Managing Director.

Name:

Signed:

Date:

Job Title:

