

BRIBERY PREVENTION POLICY

Statement

The Company is committed to bribery prevention at all levels. The Company recognises that bribery in any form diminishes the principle of free and fair competition and also has great potential to damage the Company's reputation as well as result in serious criminal sanctions.

The Company recognises that bribery prevention is primarily the Management's responsibility. The Board of Directors have a duty to ensure this policy is upheld at all times and provide the necessary funds and manpower required.

Although the implementation of this policy is a management responsibility, it is the duty of all employees to act responsibly, and to not engage in any activities that may constitute bribery.

About bribery

Bribes are financial or other advantages offered, promised or given to another person or organisation with the intention of encouraging, inducing or expecting that person or organisation to perform a function or activity improperly.

Organisation (people and their duties)

Overall and final responsibility for bribery prevention in the Company is that of Kevin Down.

All employees have the responsibility to co-operate with the directors and management to achieve bribery prevention across the Company.

Whenever an employee has a concern about potential incidents of bribery they should inform the responsible Director named above as soon as practicable.

Policy

1. Company's responsibilities

The Company will endeavour to ensure as far as is reasonably practicable:

- 1.1. The identification and monitoring of bribery risks across the Company
- 1.2. The regular assessment of bribery risks and identifying the measures needed to mitigate those risks
- 1.3. The recording of risk assessment findings where appropriate
- 1.4. That risks are reviewed and updated as and when the Company evolves into new business areas or geographic markets.

2. Information, Consultation and Training

The Company will endeavour to ensure as far as is reasonably practicable:

- 2.1. That all employees are notified about this policy
- 2.2. That relevant employees receive information and training on bribery prevention procedures
- 2.3. That employees, supervisors and managers receive adequate training and supervision to enable them to carry out their responsibilities efficiently.

3. Employees' duties

The bribery prevention policy needs the full co-operation of all employees and all employees are expected to assist in its successful implementation. All employees must have, and be seen to have, the highest standards of honesty, propriety and integrity in the exercise of their duties. In particular employees are required to:

3.1. Comply with all instructions and directions issued by the Company, its directors or authorised persons in relation to the giving or accepting of gifts, incentives, corporate hospitality or any other advantage in connection with relationships to:

- (a) any client or potential client; or
- (b) any supplier or potential supplier.

The above parties a) and b) will be referred to as 'connected parties'.

3.2. Only offer connected parties gifts, incentives or invitations to corporate hospitality events where prior approval has been given by a Director.

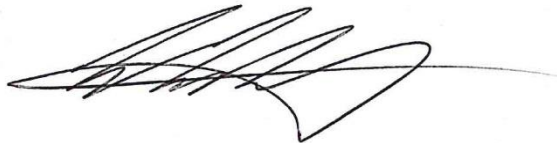
3.3. Report any offers or promise or actual giving (without acceptance given by you) of gifts or hospitality invitations provided by any connected parties.

3.4. Report any suspected incidents of bribery.

3.5. Report and co-operate in the investigation of any alleged incidents of bribery.

3.6. Attend bribery prevention training if requested.

Signed:



Mark Manley, Managing Director

Date: March 2019