

John G Peck Limited
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BRIBERY AND CORRUPTION STATEMENT

1. The Company expects the highest standards of integrity in relation to employees' dealings with the Company's customers, suppliers, agents and subcontractors and with any government official.
2. For the purposes of this section:
 1. a bribe is any gift, loan, fee, reward or other advantage given to or received from any person in order to obtain, retain or direct business or to secure any other improper advantage in the conduct of business and includes a kickback on any portion of a contract payment; and
 2. hospitality, entertainment and gifts includes but is not limited to the offer or receipt of gifts, meals, goods, services, favours, loans, trips, accommodation and the use of property or invitations to events, functions or other social gatherings.
3. Employees are prohibited from offering, giving, authorizing or accepting a bribe in any form. Employees are also prohibited from using any other route or channel to provide a bribe to or receive a bribe from the Company's customers, suppliers, agents or subcontractors or any government official.
4. Employees are required not to give or receive hospitality, entertainment or gifts if these are intended, or could be reasonably interpreted, as a reward or encouragement for a favour or preferential treatment in connection with the Company's business.
5. Employees are prohibited from making any direct or indirect contributions to political parties, organizations or individuals engaged in politics, or any charitable contribution or sponsorship as a way of obtaining advantage in business transactions without the prior approval of a Director of the Company.
6. Employees are prohibited from making any direct or indirect illicit or secret payments or transfers of value to government officials and from giving hospitality, entertainment or gifts to government officials.
7. Where Employees suspect, believe or know that an act of bribery or corruption is being considered or carried out, they are required to report this in writing to the Managing Director of the Company.