

BRIBERY AND CORRUPTION POLICY

WILLIAM
LAMB
GROUP | SINCE
1887

INTRODUCTION:

The UK Bribery Act came in to force on 1 July 2011 and it is now among the strictest legislation internationally on bribery. As well as codifying some of the existing anti-bribery and corruption laws it also introduced a new offence of corporate failure to prevent bribery. The defence for a company against this liability is to prove that it had "adequate procedures" in place to prevent the bribery. There is no doubt that this new legislation presents heightened risks for companies, directors and individuals and it is therefore critical that we as a company have zero tolerance of bribery and a robust and consistent anti-bribery programme.

POLICY:

We recognise that we are operating in countries where gift giving, in forms of money or presents is often considered a part of normal business relationships. However, there is little distinction between a gift and something that can be considered to be a 'bribe' to secure some unfair advantage.

William Lamb Group Companies is committed to conducting its business affairs so as to ensure that it does not engage in or facilitate any form of bribery or corruption. It is our policy to prohibit all forms of corruption involving our employees, contractors, agents, and any associated parties acting on our behalf.

The aim of this policy is to:

- Outline the expected standards of behaviour in relation to bribery and corruption
- Provide guidance on the giving and receiving of gifts and hospitality
- Provide guidance on how to report suspected bribery and corruption

This policy has been created for you, our supplier, to understand in a simple and clear format.

GUIDELINES:

1. Standards of Behaviour

This policy cannot cover every possible situation that may arise when conducting business activities around the world but the rule here is simple

- don't bribe anybody, at any time, for any reason.

A bribe is where someone offers, gives or agrees to give to another person any financial or other advantage as an inducement or reward for doing something improperly or not doing something properly.

You should never:

- Offer or pay bribes to William Lamb Group employees.
- Offer or pay bribes to any third party auditor and associated companies.
- Solicit or receive bribes.
- Make payments to or offer gifts to any public official in order to obtain a personal or business advantage.

William Lamb Group employees are subject to the Bribery Act and therefore it would be highly detrimental to them if they were put into a position where a bribe or gift was being offered. Your understanding of this fact and compliance with the rules is paramount.

2. Facilitation Payments

These are payments made to facilitate or speed up transactions. These are regarded as bribes and should not be paid in any circumstances. Normal administrative fees that are paid to fast track services and processes, which are advertised and available to everyone, are not bribes.

3. Associated Parties

William Lamb Group Companies can be held liable for failing to prevent a person from bribing on its behalf. This includes the actions of contractors, consultants, agents, intermediaries and anyone else who performs services for or on behalf of WLGC. Where an associated party is engaged, written contracts should be entered into documenting the terms agreed by the appropriate person within the company.

4. Hospitality and Gifts

Gifts and hospitality come in many different guises and this policy is not able to provide an exhaustive list, however as a guide, it refers to gifts such as monetary payments, presents, and hospitality such as meals, hotels and travel, and invitations to events.

WLGC employees must comply with the following:

- Never to accept or give money
- Never to give gifts to a public official, including foreign public officials. This includes gifts from an associated party of WLGC given on our behalf.
- Never to get involved in a situation where personal gain is placed above loyalty to the company or its best interests.
- Report any offer of gifts or favours of unusual or questionable nature to their Line Manager immediately.

Hospitality such as a lunch or dinner on occasions is acceptable if they are incidental to business related activity and are of nominal value.

The UK Government has charged the Serious Fraud Office with investigating suspected bribery and corruption offences across organisations in line with the Bribery Act 2011. The offence carries criminal penalties for both individuals and companies. For individuals, a

maximum prison sentence of 10 years and/or an unlimited fine can be imposed. For companies, an unlimited fine can be imposed.

Therefore, you the supplier cannot make an offer of a gift or accept them.

We would ask that you now sign this policy and keep one on record and return another copy to The Corporate Compliance Manager at William Lamb Group. By signing this policy you agree with its contents and will abide by its principles.

Signature:..... Print Name:.....

Position Held:.....

Date:.....