

ANTI-BRIBERY AND CORRUPTION POLICY

OVERVIEW

Aquilant (hereinafter referred to as the “Company”) are committed to conducting its business in an open, honest and ethical manner and take a zero-tolerance approach to all forms of bribery and corruption. The Company will not condone under any circumstances the offering, receiving or facilitation of bribes or any form of improper payments and we will always adhere strictly to relevant laws in relation to corruption.

A record of all relevant entertainment and gifts given or received should be recorded in the Gifts and Entertainment Register which is retained by each Business Unit. Gifts received remain the property of the business and should not be passed on to individuals who are not Aquilant employees.

POLICY STATEMENT

The giving or receiving of reasonable gifts and entertainment is permitted, but only if the guidelines set out below are followed:

1. They are intended only to foster legitimate business relations;
2. Their nature, their timing and the circumstances in which they are given, are not capable of either improperly influencing the recipient or being perceived as improperly influencing them;
3. The rules or laws applying to the recipient, particularly if they are public officials, will not be breached by the giving of the gift or entertainment.

Do not provide or receive payments or gifts, entertainment or favours if this could lead to an employee or someone else misusing their position or performing their job improperly.

The value of all gifts given to or received from a single person/supplier should not exceed £100.00 in any 12-month period unless authorised by your business unit Managing Director;

The aggregate value of all gifts given or received should not exceed £250 in any 12-month period unless authorised by your business unit Managing Director.

Rule # 1

Do not offer, promise or give bribes

Rule # 2

Do not request, agree or accept bribes

Rule # 3

Do not provide gifts, entertainment or facilitation payments to public officials

WHERE TO GET HELP

Anti-bribery and corruption laws can be complicated. The Company understand that sometimes it can be difficult to know what is okay and what is not. If an employee is ever in any doubt, then the first thing they should do is stop and ask., by contacting someone in the Compliance Team.

If an employee knows, suspects or is worried that something is wrong, they must report it. If they feel uncomfortable doing this, tell one of the Compliance team in confidence.