## ANTI BRIBERY AND CORRUPTION POLICY

### Definition

Degould Limited ("Degould") operates a formal anti bribery and corruption procedure as documented below.

### Scope

All Degould employees and sub-contractors.

### Objective

Degould is committed to conducting business in an honest way, and without the use of corrupt practices or acts of Bribery to obtain an unfair advantage.

### Guidelines

Bribery is the offer, promise, giving, demanding or acceptance of an advantage as an inducement for an action which is illegal, unethical or a breach of trust.
A bribe could be a promise, offering or anything of value. This would include loans, fees, donations, aid or voting to exert an improper influence.
Corruption is the misuse of public office or power for private gain; or misuse of private power in relation to business outside the realm of government.
Gifts, entertainment and hospitality in connection with matters related to our business are not defined as bribes or corruption.

### Prevention

Degould is committed to an ongoing process of risk assessment and education to pinpoint and eliminate bribery and corruption. This will include accurate and complete record-keeping, internal audit and general monitoring of staff by directors. As there may be some areas that staff are unsure about the following procedures should be followed.

### Record Keeping

When receiving any gifts or invitation of entertainment or hospitality this will be notified to the Head of Finance and Compliance who will make a record of the offer and confirm whether it is appropriate or not to accept the offer.

### Whistle Blowing

If any member of staff believes another has received any gift, entertainment, hospitality or any other inducement without notifying the company they have a duty to make a director aware of this concern. This action will be under the company whistle blowing policy detailed elsewhere.

### Communication

Degould will communicate this policy to all staff and suppliers.

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| Signature                    Date 16.01.2017 |
| On Behalf of the Company Directors – **DG Gould** |

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