

## It is Stonbury policy to conduct business in an honest way, and without the use of corrupt practices or acts of bribery to obtain an unfair advantage.

Stonbury is committed to ensuring compliance to the highest legal and ethical standards which must be reflected in every aspect of the way the Company operates. Stonbury strive to ensure that integrity is brought to all company dealings. Bribery and corruption harms all business in which these acts are committed and prevents economic growth and development.

The policy is not just a cultural commitment on the part of the company's it is a moral issue and a legal requirement. Bribery is a criminal offence, and corrupt acts expose the Company and its employees to the risk of prosecution, fines and imprisonment, as well as endangering Stonbury's reputation. Stonbury therefore is committed to the implementation of bribery prevention policies / procedures designed to mitigate identified risks as well as to prevent deliberate unethical conduct:-

- Prevention of bribery and Corruption throughout the whole organisation through the involvement of the Stonbury's top-level management.
- The use of risk assessment to identify both internal and external commercial activities that may present opportunities for Bribery and or Corruption. To ensure that the control measures identified within the Stonbury Risk Assessment are maintained, remain affective and reviewed annually.
- Conduct due diligence of existing or prospective associated persons to Stonbury.
- Stonbury do not provide the provision of gifts (other than Stonbury calendars provided at Christmas sanctioned by the board of directors), hospitality and promotional expenditure; political donations; or demands for facilitation payments.
- All Stonbury direct and indirect employment including new recruits will be provided with terms and conditions of employment including, disciplinary action and remuneration.
- Stonbury's governance of business relationships with all other associated persons will include pre and post contractual agreements.
- Stonbury shall provide the provision of financial and commercial controls through the company's accounting function, including external auditing and approval of expenditure at various levels within Stonbury.
- Stonbury shall ensure the provision of transparency of transactions and disclosure of information.
- Stonbury shall enforce the Anti-Bribery & Corruption Policy any breaches to the policy will result in discipline action against those found to be guilty.
- Stonbury shall ensure that 'speak up' or 'whistle blowing' procedures are maintained and communicated to all company employees.
- Stonbury shall ensure that the Anti – Bribery & Corruption Policy and associated procedures are communicated to all company employees.
- Stonbury shall ensure that provision of Information Instruction and Supervision of the Anti-Bribery & Corruption Policy are maintained.
- Stonbury shall monitor annual review and evaluate of the above policy.

Signed by the Board of Directors of Stonbury on 14th January 2017 next review in 12 months time- CMS15

