

ANTI-BRIBERY & CORRUPTION STONBURY GROUP POLICY

Doc No. Policy-011 Version 4.0 Date 01-07-21 Owner Group Managing Director

stonbury

PURPOSE

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.

SCOPE

This policy applies to all group companies of Stonbury (Holdings) Ltd (the "Group"). It applies to all work activities undertaken on behalf of the businesses.

MEASURES

The business 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. We 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 our 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 top- level management who will ensure the Anti-Bribery & Corruption Policy and associated procedures are communicated to all company employees and that employees have signed a declaration that they have read and understood and will abide by the policy.
- All employees will understand that breaches maybe reported to the police and that bribery and corruption is a criminal offence that may be punishable by up to 10 years imprisonment.
- The business will ensure the identified control measures within the Risk Assessments and Procedures are maintained and reviewed.
- 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 direct and indirect employment including new recruits will be provided with terms and conditions of employment including, disciplinary action and remuneration.
- Our governance of business relationships with all other associated persons will include pre and post contractual agreements.
- We 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 relevant transactions and disclosure of information.
- We 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.

REVIEW AND COMMUNICATION

We will review and revise this policy at regular 12 monthly intervals, as part of change planning, lessons learned, knowledge transfer and post incident. We will communicate this policy throughout all levels of the group and make it available to interested parties on request.

APPROVAL

Signed by the Group Managing Director



Ian Mellor
Date 1st July 2021

