

Acorn Environmental Management Group Ltd

Anti-Bribery and Corruption Policy

Anti-bribery and Anti-corruption Policy Statement

AEMG will not tolerate bribery or allow improper offers or payments to or from its employees or consultants placed by the company with clients, where these relate to the duties / responsibilities associated with that placement.

AEMG will ensure that all employees are made aware of this policy by:

- Explaining this policy to all new employees as part of the AEMG's formal induction procedures and documenting this in accordance with AEMG's accredited quality management system.
- Including reference to this policy in employment contracts for employees and contracts for services for all consultants.
- Displaying this policy in company offices and issuing a copy of this policy to all field service engineers.
- Any supplier or sub-contractor whose duties and responsibilities cover activities where this policy would be relevant shall be identified by the Managing Director and shall be issued with a copy of this policy and required to comply with it.

To support employees in their compliance with this policy, AEMG confirms the following:

- Employees should consult their line manager, if they consider that they have been offered a bribe or form of improper payment or they consider that they may have come across evidence of such practices. Any such incident should then be referred to the Directors who will ensure that it is investigated in an appropriate manner.
- Minor gifts, such as souvenir or corporate gifts may be accepted where their estimated value is less than £75. Any gift potentially exceeding this or any money offered must be referred to the Directors who shall record the circumstances and decide on appropriate action.
- Hospitality offered shall be reviewed in advance by a Director and, if appropriate, approved by him in writing.
- The regularly held Account Manager meetings shall include a review of any instances of any of the above and the Managing Director shall ensure that any significant discussion and all agreed actions associated with these recorded.
- The annual management review, held in accordance with AEMG's accredited quality management system will review any reported instances and confirm action taken and also confirm the identified level of compliance with the policy and review the policy.

Signed:

A handwritten signature in black ink, appearing to be 'S. [unclear]', written over a yellow rectangular background.

Date: 1st February 2018

Managing Director

1. Introduction

Acorn Environmental Management Group values its reputation and is committed to maintaining the highest level of ethical standards in the conduct of its business affairs. The actions and conduct of the company's staff as well as others acting on the company's behalf are key to maintaining these standards.

The purpose of this document is to set out the company's policy in relation to bribery and corruption. The policy applies strictly to all employees, directors, agents, consultants, contractors and to any other people or bodies associated with the Acorn Environmental Management Group within all regions, areas and functions.

2. Understanding and recognising bribery and corruption

Acts of bribery or corruption are designed to influence an individual in the performance of their duty and incline them to act in a way that a reasonable person would consider to be dishonest in the circumstances.

Bribery can be defined as offering, promising or giving a financial (or other) advantage to another person with the intention of inducing or rewarding that person to act or for having acted in a way which a reasonable person would consider improper in the circumstances. Corruption is any form of abuse of entrusted power for private gain and may include, but is not limited to, bribery.

Bribes are not always a matter of handing over cash. Gifts, hospitality and entertainment can be bribes if they are intended to influence a decision.

3. Penalties

The Bribery Act 2010 came into force on 1 July 2011. Under that Act, bribery by individuals is punishable by up to ten years' imprisonment and/or an unlimited fine. If the firm is found to have taken part in the bribery or is found to lack adequate procedures to prevent bribery, it too could also face an unlimited fine.

A conviction for a bribery or corruption related offence would have severe reputational and/or financial consequences for the firm.

4. Acorn Environmental Management Group's policy

Acorn Environmental Management Group will not tolerate bribery or corruption in any form.

The firm prohibits the offering, giving, solicitation or the acceptance of any bribe or corrupt inducement, whether in cash or in any other form:

- *to or from* any person or company wherever located, whether a public official or public body, or a private person or company;
- *by* any individual employee, director, agent, consultant, contractor or other person or body acting on the company's behalf;
- *in order to* gain any commercial, contractual, or regulatory advantage for the firm in any way which is unethical or *to* gain any personal advantage, pecuniary or otherwise, for the individual or anyone connected with the individual.

This policy is not intended to prohibit the following practices provided they are appropriate, proportionate and are properly recorded:

- normal hospitality, provided that it complies with the company's Corporate Entertainment Policy;
- fast tracking a process which is available to all on the payment of a fee; and/or
- providing resources to assist a person or body to make a decision more efficiently, provided that it is for this purpose only.

It may not always be a simple matter to determine whether a possible course of action is appropriate. If you are in any doubt as to whether a possible act might be in breach of this policy or the law, the matter should be referred to your Head of Department. If necessary, guidance should also be sought from the Company Directors.

The firm will investigate thoroughly any actual or suspected breach of this policy, or the spirit of this policy. Employees found to be in breach of this policy may be subject to disciplinary action which may ultimately result in their dismissal.

5. Key risk areas

Bribery can be a risk in many areas of the firm. Below are the key areas you should be aware of in particular:

Excessive gifts, entertainment and hospitality: can be used to exert improper influence on decision makers. Gifts, entertainment and hospitality are acceptable provided they fall within the company's Corporate Entertainment Policy.

Facilitation payments: are used by businesses or individuals to secure or expedite the performance of a routine or necessary action to which the payer has an entitlement as of right. The firm will not tolerate or excuse such payments being made.

Reciprocal agreements: or any other forms of 'quid pro quo' are never acceptable unless they are legitimate business arrangements which are properly documented and approved by management. Improper payments to obtain new business retain existing business or secure any improper advantage should never be accepted or made.

Actions by third parties for which the firm may be held responsible: can include a range of people i.e. agents, contractors and consultants, acting on the company's behalf. Appropriate due diligence should be undertaken before a third party is engaged. Third parties should only be engaged where there is a clear business rationale for doing so, with an appropriate contract. Any payments to third parties should be properly authorised and recorded.

Record keeping: can be exploited to conceal bribes or corrupt practices. We must ensure that we have robust controls in place so that our records are accurate and transparent.

6. Employee responsibility and how to raise a concern

The prevention, detection and reporting of bribery or corruption is the responsibility of all employees throughout the firm. If you become aware or suspect that an activity or conduct which is proposed or has taken place is a bribe or corrupt, then you have a duty to report this.

Any such incidents should be reported in accordance the company's whistle blowing policy (which can be found in the Employee Compliance Handbook) or to one of the Company Directors immediately.