ANTI BRIBERY & CORRUPTION POLICY STATEMENT

P J Edwards & Co (UK) Ltd are committed to high standards of business conduct that is, as a minimum, compliant with the Bribery Act 2010.

P J Edwards & Co (UK) Ltd understand that inappropriate entertainment or offering of gifts can create a conflict of interest, or at least give the appearance that decisions made on behalf of P J Edwards & Co (UK) Ltd are being improperly influenced by what they receive from third parties. P J Edwards & Co (UK) Ltd are also aware of the potential harm to our reputation and relationships with external parties from unethical business conduct.

The purpose of this policy is to set out the standards regarding the giving and receiving of any form of hospitality, promotional or other business expenditure provided or received. This is required to ensure that any such hospitality is:

- Lawful and ethical
- Occasional
- Proportionate and reasonable, given the type of business we operate.
- In support of this policy and the P J Edwards & Co (UK) Ltd business.

Employees must adhere to the formalised levels of authority to ensure suitable segregation of duties to minimise the opportunity for any fraudulent activities,

All levels of management must demonstrate commitment to operating in an environment that prevents bribery or corruption.

Should there be any suspicion of any such conduct; a full investigation will be undertaken by a nominated external organisation to ensure a bone fide conclusion. Depending on the findings of such an investigation, disciplinary or criminal proceedings will be instigated where necessary.

This policy applies to all P J Edwards & Co (UK) Ltd employees and subcontractors.

Failure to comply with this policy may result in disciplinary and/or criminal proceedings being instigated.

Signed:

Adrian Norridge
Operations Director (UK)