



Anti-Bribery Policy

Introduction

Cordie Ltd values its reputation and strives to undertake its business fairly, with honesty and transparency and in full compliance with the provisions of the Bribery Act 2010. We will not therefore tolerate bribery under any circumstances. The following policy applies equally to all divisions of Cordie Ltd.

Purpose

Cordie Ltd aims to limit its exposure to bribery by setting out a clear anti-bribery policy for all its employees and Associates to familiarise themselves with and adhere to, it also encourages employees and Associates to be vigilant and report any suspicion of bribery.

Policy

Bribery is a criminal offence which principally arises in the following circumstances:

Offering a bribe

Directly or indirectly, offering; giving; soliciting or accepting any bribe, either in cash or any other form of inducement, to or from any person or company whether they are a public official or body or private person or company.

Receiving a bribe

Directly or indirectly requesting or agreeing to accept a financial or other advantage in return for improperly providing any commercial, contractual, regulatory or personal advantage, therefore asking for or receiving a bribe from a person in return for improperly providing some favour to the person is a criminal offence.





Responsibility

This policy is applicable to all directors, employees and Associates of Cordie Ltd and any actual or suspected breach of this policy will be investigated seriously. Employees may be subject to disciplinary action which may ultimately result in their dismissal. In the case of third parties found to be bribing or attempting to bribe Cordie Ltd employees, Associates, suppliers or clients, they will be informed in writing that business dealings will be ceased and appropriate authorities will be informed.

Further Clarification for Employees and Associates

Cordie Ltd recognises that you should not be prohibited from performing your work provided that the activities are customary, appropriate and properly recorded, an example of acceptable activities include:

- Normal hospitality
- Providing a ceremonial gift at a special time
- Fast tracking a process when it is available to all on payment of a fee
- Providing resources to assist the person or body to make the decision more efficiently provided it is for this purpose only.

It may not be easy to make a decision if something is appropriate, if you are in doubt that a potential act does not conform to this policy, the matter should be referred to one of the directors.

This policy applies to all the operating divisions of Cordie Ltd. Cordie Ltd reserves the right to amend the Anti-Bribery Policy from time to time. Thank you for your commitment to this policy.

Andrea Reynolds
Managing Director, Cordie Ltd

