



## **Anti - Bribery and Corruption Policy Statement**

E&B Group Ltd is committed to applying the highest standards of ethical conduct and integrity in its business activities. Every employee and individual acting on E&B Group Ltd's behalf is responsible for conducting company business honestly and professionally.

E&B Group Ltd considers that bribery and corruption has a detrimental impact on business by undermining good governance and distorting free markets.

E&B Group Ltd benefits from carrying out business in a transparent and ethical way and by helping to ensure that there is honest, open and fair competition in our sectors. Where there is a level playing field, E&B Group Ltd can lead the market through innovation and by delivering excellent services and products to its customers.

E&B Group Ltd does not tolerate any form of bribery by, or of, its employees or any persons or companies acting for it or on its behalf. The Board and senior management are committed to implementing and enforcing effective systems to prevent, monitor and eliminate bribery, in accordance with the Bribery Act 2010.

E&B Group Ltd has issued an ethical behaviour policy outlining E&B Group Ltd's policy on preventing and prohibiting bribery. The ethical behaviour policy applies to all employees and they are required to familiarise themselves and comply with this ethical behaviour policy.

A bribe is a financial advantage or other reward that is offered to, given to, or received by an individual or company (whether directly or indirectly) to induce or influence that individual or company to perform public or corporate functions or duties improperly.

Employees and others acting for or on behalf of E&B Group Ltd are strictly prohibited from making, soliciting or receiving any bribes or unauthorised payments. As part of its anti-bribery measures, E&B Group Ltd is committed to engage only in transparent, proportionate, reasonable and bona fide hospitality and promotional expenditure.

A breach of E&B Group Ltd's ethical behaviour policy by an employee will be treated as grounds for disciplinary action, which may result in a finding of gross misconduct and immediate dismissal.

Employees and other individuals acting for E&B Group Ltd should note that bribery is a criminal offence that may result in up to 10 years' imprisonment and/or an unlimited fine for the individual and an unlimited fine for E&B Group Ltd.

E&B Group Ltd will not conduct business with service providers, agents or representatives that do not support the E&B anti-bribery objectives.

The success of E&B Group Ltd's anti-bribery measures depends on everyone playing their part in helping to detect and eradicate bribery. Therefore, all employees and others acting for, or on behalf of, E&B Group Ltd are encouraged to report any suspicious activity to the Compliance Officer (the Head of Internal Audit and Risk Assurance). E&B Group Ltd's Executive Board will support any individuals who make such a report in good faith.

Signed: *Peter A. Gaskill*  
PETER A. GASKILL  
**DIRECTOR**

Date: **1<sup>st</sup> April 2017.**