

This is the Anti-Bribery and Corruption Policy ("Policy") for the Bridon group of businesses (collectively referred to as "Bridon")

This Policy applies to all individuals working at all levels, including senior managers, officers, directors, employees (whether permanent, fixed-term, or temporary), pension trustees, consultants and other business advisers, contractors, trainees, casual workers/agency staff, volunteers, business agents, distributors, joint venture partners, or any other person working for, or performing a service on behalf of Bridon (collectively referred to as "Associates" for the purposes of this policy) throughout the world.

The Policy has been approved by Bridon's board of directors and the executive management teams of each subsidiary business.

Bridon Policy Statement

One of the fundamental principles of Bridon is to conduct all of its business in an open, honest and ethical manner. We take a zero tolerance approach to bribery and corruption and are committed to acting professionally, fairly and with integrity in all business dealings and relationships, within all jurisdictions in which we operate. Bribery and corruption are an unfortunate fact of life in some parts of the world but are a barrier to economic and social development.

Bridon's reputation for lawful and ethical business relations is important and we require all employees and other business associates, whether employed directly or indirectly (including customers, suppliers, agents, distributors, and others working for or on behalf of Bridon), to act professionally and with integrity.

The prevention, detection and reporting of bribery and other forms of corruption are the responsibility of all employees across Bridon; each employee is required to avoid any activity that might constitute, lead to, or suggest, bribery and/or corruption activities.

Bribery is an offence within the majority of countries around the world and penalties can be severe. Within the UK, the Bribery Act 2010 makes bribery and corruption illegal; it also holds UK companies liable for failing to implement adequate procedures to prevent such acts committed by employees or other business associates working on behalf of Bridon, no matter where in the world it takes place. Corrupt acts, wherever in the world they are committed (including those committed by business partners such as agents, distributors or joint venture partners), could result in legal action being taken against Bridon and it is therefore obvious why anti-bribery and corruption policies are taken very seriously within the group structure.

It is recognised that market practices vary from country to country and that it is not always easy to decide what is acceptable from an anti-bribery perspective. Bridon's anti-bribery policy is not designed to prohibit the acceptance or offer of reasonable and customary gifts and hospitality. However, employees and business associates should bear in mind that transparency is fundamental to maintaining the zero tolerance position of Bridon with respect to bribes and other improper payments. The key consideration to remember is that no inducements should be accepted or offered if the intention is to influence the recipient in order to gain or retain a business advantage.

Bridon has issued a detailed anti-bribery policy to ensure that key employees and business associates are fully aware of their responsibilities and the consequences for non-compliance. The policy also provides guidance in relation to where the biggest bribery and corruption risks are for the group and how to reduce such risks.

Any employee who is aware of possible bribery and corruption activities should feel comfortable in disclosing such details and further information about the disclosure process can be found within Bridon's whistleblowing policy. A commitment has been made within Bridon to ensure that employees who do come forward with such information are protected to the fullest extent possible.

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Chief Executive Officer

Bridon International Limited

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