







Gifts or hospitality involving third parties involved in any competitive bid or tender process that you are – or may considered to be – involved in.

Payments of cash (or cash equivalents) or paying someone else's personal bills or expenses.

Any hospitality that may be considered indecent or inappropriate as part of a business relationship or which may have a negative effect on the Company's reputation.

Gifts or hospitality that you are not prepared to report or seek approval for internally irrespective of whether you use personal or company hospitality.

No undisclosed or unrecorded account, fund or asset shall be established or maintained by any person or organisation. Full and proper records shall be kept of all transactions involving the Company. Supporting documents shall be readily available, genuine and shall accurately describe the nature of any transactions undertaken.

You are required to avoid any contact that might lead to, or suggest, a conflict of interest between your personal activities and the business of the Company or its clients. All employees are required to disclose family links or other close relationships with a relevant decision maker in a client, supplier or competitor organisation; financial interests in a client, supplier or competitor organisation and activities on behalf of a client or another in such a way that the trust vested in the Company by a third party (client or other business partner) may be abused.

If you have a concern or know of or suspect a violation of this policy, we want you to speak up immediately,