

UNITECH INDUSTRIES GROUP ANTI-BRIBERY & CORRUPTION POLICY

COMPANY/LEGAL ENTITY (Part of the Unitech Industry Group)					
Corsair Engineering Ltd	X	Corsair Wholesale Ltd (T/A Valera)	X	Driver Southall Ltd	X
Francis Commercial Kitchen Services Ltd	X	HM Steeltech Ltd	X	ScoMac Catering Equipment Ltd	X
SMART Balustrades Ltd	X	Stellex Manufacturing Ltd	X	Unitech Blaymires Ltd	X
Unitech Engineering Ltd	X	Unitech Machinery Ltd	X	Unitech Projects Ltd	X

1. AIM OF POLICY

Unitech strives to undertake our business fairly with honesty and transparency. This must be reflected in every aspect of our business affairs. The action and conduct of Unitech Directors and employees (collectively Unitech personnel) as well as others acting on Unitech behalf are essential to maintaining these standards. To that end, all Unitech personnel, including agents, consultants and contractors as well as suppliers involved in Unitech UK/international business must read, become familiar and comply with this Anti Bribery Policy and the Gifts and Entertainment Policy (O:/HR/ Gifts and Entertainment Policy).

2. COMPLIANCE WITH ANTI-BRIBERY LAWS

- 2.1 It is Unitech policy to comply with all laws, rules, and regulations governing anti-bribery and corruption law, in all the countries where we operate. Unitech has a zero-tolerance approach to acts of bribery and corruption, by employees or anyone acting on our behalf. Any breach of this policy will be regarded as a serious matter by the Company and which will likely result in disciplinary action.
- 2.2 Under UK law (UK Bribery Act 2010), bribery and corruption is punishable for individual by up to ten years imprisonment. If the company is found to have taken part in the corruption or lacks adequate procedures to prevent bribery, it could face an unlimited fine and, be excluded from tendering for Government contracts and face untold damage to its reputation.
- 2.3 The payment or offer to pay bribes, or provisions of, or offer to provide gifts or anything of values for improper purposes to obtain or retain business or any other benefit, (whether for Unitech or any other party) is prohibited. Such payments or gifts are also forbidden under the terms of this policy any may result in immediate dismissal for those involved in their payment or receipt.
- 2.4 Unitech is required to keep financial records and to have appropriate internal controls in place which will evidence the business reason for making payments to their parties.

3. APPLICATION OF THE POLICY

- 3.1 The policy applies to individual employees, agents, sponsors, intermediaries, consultants or any other people or bodies associated with Unitech or any of its subsidiaries and employees. Bribery is committed when an inducement or reward is provided, in order to gain any commercial, contractual, regulatory or personal advantage for Unitech or another party.
- 3.2 No bribes of any sort may be paid or accepted from customers, suppliers, politicians, government advisors or representative's private person or Company. It is not permitted to establish accounts or internal budgets for the purpose of making facilitation bribes or influencing transactions (slush funds).
- 3.3 Unitech recognises that to refuse a gift in certain circumstances and/or countries would cause offence to our trading partners. The test to be applied in all circumstances is whether the gift or entertainment is reasonable and justifiable. What is the intention of the gift? If the gift being offered for something in return (quid pro quo). This policy does not prohibit the following practices providing they are customary in a particular market, or are appropriate and properly records. Please refer to our Gifts & Entertainment Policy for further information.

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3.4 Normal and appropriate hospitality (given or received). The giving of ceremonial gifts on a festival or at another special time, up to and not exceeding the value of 100 Pounds/Euros.

4. EMPLOYEE RESPONSIBILITY

4.1 The presentation, detection and reporting of bribery is the responsibility of all employees throughout the Group. Suitable channels of communication by which the employee or others can report confidentially any suspicion of bribery, which will be maintained through Unitech Whistle Blowing Policy (O:/HR/ Whistle Blowing Policy) and see information below.

4.2 If you become aware that an activity or conduct which has taken place which you suspect is bribery (or corrupt) you have a duty to report this. Any such incidents should be reported to your Supervisor/Line Manager or, you should follow the Whistle Blowing contacts.

5. WHISTLE BLOWING – WHO TO CONTACT

In the first instance raise your concerns about any form of malpractice with the Company's Designated Whistleblower Officer (DWO) who is currently Keith Allcock. If you feel that the disclosure is extremely serious or in any way involves the DWO, you should report it directly to the HR Department and Board of Directors.

6. MONITORING AND REVIEWING OF POLICY

The Board of Directors will be responsible for reviewing this policy from a legislative and operational perspective periodically.

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