

Anti-Bribery & Anti-Corruption Policy
Reference: CSR-002

THE POWER TO DELIVER

Scope

The Company conducts all its business in an honest and ethical manner and takes a zero-tolerance approach to bribery and corruption. We are committed to acting professionally, fairly and with integrity to ensure that the Company's business is conducted in a socially responsible manner.

This policy is to ensure compliance with all current anti-bribery and anti-corruption regulations in all our business dealings and to provide effective systems to counter bribery and corruption. We will uphold all laws relevant to countering bribery and corruption in all the jurisdictions in which we operate. Notwithstanding, we remain bound by the laws of the UK, including the Bribery Act 2010, in respect of our conduct both at home and abroad. Bribery and corruption are punishable for individuals by up to ten years' imprisonment and a fine. If we are found to have taken part in corruption, we could face an unlimited fine, be excluded from tendering for public contracts and face damage to our reputation. We therefore take our legal responsibilities very seriously.

This policy covers any individual or organisation you encounter during your work for the Company; this includes actual & potential clients, customers, suppliers, distributors, business contacts, agents, advisers, and government & public bodies, including their advisors, representatives and officials, politicians, and political parties.

This policy does not form part of any employee's contract of employment, and it may be amended at any time.

Policy Application

This policy applies to individual employees, agents, sponsors, intermediaries, consultants or any other people or bodies associated with Jointing Technologies and its employees. Bribery is committed when an inducement or reward is provided to gain any commercial, contractual, regulatory, or personal advantage for Jointing Technologies or another party. No bribes of any sort may be paid or accepted to/from customers, suppliers, politicians, government advisors or representative's, private persons, or companies. It is not permitted to establish accounts or internal budgets for the purpose of making facilitation bribes or influencing transactions (slush funds).

Jointing Technologies recognises that to refuse a gift in certain circumstances 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. In any such cases the employee should consider the intention of the gift i.e. is the gift being offered for something in return (quid pro quo)?

This Policy does not prohibit such practices providing they are customary in a particular market and are appropriate and properly recorded. (Please refer to our code of conduct on gifts and entertainment policy for further information).

The giving of ceremonial gifts on a festival or at another special time, up to and not exceeding the value of 100GBP is acceptable.

Employee Responsibility

The detection and reporting of bribery or corruption is a responsibility of all employees throughout the Company. Suitable channels of communication are established by which employees or others can report confidentially any suspicion of bribery.

If you become aware that an activity or conduct has taken place which you suspect to be a bribe (or corrupt) you have a duty to report it. Any such incidents should be reported normally to your manager or alternatively you can use the Whistle Blowing contacts.

Whistleblowing

For further clarification on any point, please contact the DPO (Data Protection Officer), currently Meirion Williams, or the Managing Director.

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 100GBP or 100 Euros

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