

## Policy Statement

# Anti-Bribery and Corruption

It is our policy to conduct all of our business in an 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 our business dealings and relationships wherever we operate. Mick George Ltd (MGL) will not, directly or indirectly, offer, promise, give, accept or demand a bribe or other undue advantage in order to obtain or retain business.

MGL expects the same approach to doing business from its business partners and suppliers. This means that MGL and its employees will never seek, accept or give a bribe, facilitate kickback or other improper payments. We must always ensure that we operate with appropriate transparency in all our business dealings. The specific objectives for this anti-bribery and corruption Policy are to help ensure that MGL will;

- Carry out its business fairly, honestly and openly.
- Help prevent fraud, bribery and corruption
- Promote early detection and ensure its effective investigation

Each employee is accountable for:

- Complying with this policy and delivering best practice at all times.
- Reporting any malpractice of this kind to their line manager.
- Acting with honesty, integrity and fairness in all aspects of their business dealing and exercise appropriate standards of professionalism and ethical conduct in all their activities

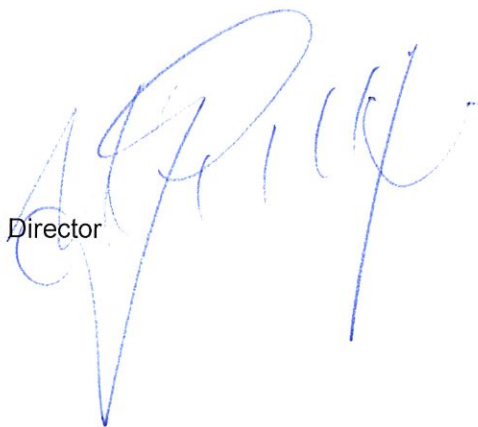
### Definitions

- **Bribery:** The receiving/offering/giving/providing/requesting/accepting of a financial or other advantage, in order to seek to induce a person or to induce a person to give improper assistance in breach of their duty, or to otherwise influence someone with the underlying purpose of obtaining/retaining business, or an advantage in the course of business. "Bribery" for this purpose includes so-called "facilitation" or "grease" payments, defined as nondiscretionary payments made to government or public officials to speed up routine administrative processes, even if such payments are nominal in amount.
- **Corruption:** The misuse of entrusted power/breach of duty for personal gain

This policy will be made available to our employees, those working for or on behalf of MGL and provided on request to any other interested parties. The policy will be reviewed annually, subject to changes in company procedure or legislation.

Signed:

Managing Director



Date: January 2018