



BRIBERY AND CORRUPTION POLICY

1. Policy Statement

It is Scutum UK Ltd's policy to conduct all of our business in an honest and ethical manner. We take a zero tolerance approach to bribery and corruption. We are committed to acting professionally, fairly and with integrity in all our business activities. We are also committed to enforcing effective systems to counter bribery and corruption.

This policy applies to all individual employees - directors, managers, account managers, engineering team leaders and engineers- whether temporary or permanent.

2. What is bribery and corruption

A bribe is a financial or other advantage offered, promised or provided in order to gain any commercial, contractual, regulatory or personal advantage. Bribery or corruption is designed to influence an individual in their activity and usually causes them to be dishonest.

3. Gifts and Hospitality

This policy does not prohibit the acceptance of normal and appropriate receipt of hospitality. In certain circumstances gifts and hospitality are unacceptable and our employees will not provide or receive gifts or hospitality with the intention to persuade or be persuaded to act improperly or influence performance of their normal duties.

4. Facilitation Payments and Kickbacks

Our employees will not make and will not accept facilitation payments or kickbacks of any kind.

5. Donations

Scutum UK Ltd does not make donations of any kind to political parties. No charitable donations will be made to gain commercial advantage.

6. Record Keeping

Scutum UK Ltd keeps financial records and have controls in place which will evidence the business reason for making payments to third parties. All expenses claims relating to gifts, hospitality and expenses occurred to third parties must be marked with the reason for the expense and submitted to MD/Finance Director/Line Manager for approval under this policy.

7. Monitoring

This policy is reviewed on an annual basis or at the monthly management meeting as required. Any changes or improvements will be implemented as required.

The policy is available to all employees and interested parties and can be found on our website.

David Armstrong

A handwritten signature in black ink, appearing to be "DA", with a large, stylized flourish extending to the right.

Managing Director
Scutum UK Ltd

Date: 1st January 2021
Review Date: 31st December 2021