

Anti-Corruption and Bribery Policy Statement

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 and implementing and enforcing effective systems to counter bribery.

We will uphold all laws relevant to countering bribery and corruption. The purpose of our policy is to:

- a) Set out set out our responsibilities, and of those working for us, in observing and upholding our position on bribery and corruption; and
- b) Provide information and guidance to those working for us on how to recognise and deal with bribery and corruption issues

Bribery and corruption are punishable for individuals by up to ten years' imprisonment and 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.

We have identified particular risks for our business which are outlined in our policy; we operate in the property maintenance sector and contract mostly with the public sector. To address those risks we have produced our policy, sent out a clear anti-bribery statement from our Managing Director, inserted anti-bribery provisions in our supply chain contracts, put into place face to face and other training for other staff and implemented an essential register for gifts and hospitality.

Within our policy document, third-party means any individual or organisation we come into contact with during the course of our work, and includes actual and potential clients, customers, suppliers, consultants, distributors, business contacts, agents, advisers, and government and public bodies, including their advisors, representatives and officials, politicians and political parties.

Mark Gelder Managing Director

M Celelo-