

POLICY STATEMENT

SIMPSON is committed to conducting business fairly, ethically and within the law. In accordance with the Bribery Act 2010 we will not tolerate bribery in any form.

WHO IS COVERED BY THIS POLICY

This policy applies to all SIMPSON employees whether permanent or temporary. It also applies to **SIMPSON** supply chain partners, including sub-contractors.

WHAT IS BRIBERY

Bribery is a criminal offence under the Bribery Act 2010. There are four offences:

- Bribing another person
- Being bribed
- Bribing a foreign public official
- Failure of a commercial organisation to prevent bribery

We must not pay or accept improper payments whether directly or indirectly, which may influence us or another party to act improperly.

GIFTS, HOSPITALITY, ENTERTAINMENT AND EXPENSES

- We only accept gifts and entertainment of a minimal value, if offered in the normal course of business.
- Must be given at corporate level not an individual level, and be given openly.
- Not include cash or an equivalent.
- Not constitute an offence under the Bribery Act.
- **SIMPSON** employees must inform the company's Marketing Co-ordinator of all gifts and entertainment offered or accepted, for company records.

YOUR RESPONSIBILITIES

You must ensure that you have read and understood this policy, and comply with its terms at all times when acting on behalf of **SIMPSON**.

COMMUNICATION

This policy will be communicated to our suppliers; contractors and business partners who will be asked to review the policy and abide by its terms.

RAISING CONCERNS AND SEEKING GUIDANCE

We would encourage anyone who has concerns to raise them with **SIMPSON** Finance Director who will arrange for investigation. Anyone who raises a concern in good faith will not be penalised or criticised in any way.

PENALTIES

Violation of the Bribery Act 2010 is a serious matter and could result in significant criminal and/or civil penalties.

Proven violation will also result in disciplinary action, up to, and including termination of employment or other contract.

A handwritten signature in black ink, appearing to read 'RC Gatenby', with a stylized flourish at the end.

RC GATENBY
CHAIRMAN & CHIEF EXECUTIVE
March 2017