

## 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**  
**Simpson (York) Ltd**  
March 2019