



## **Anti Bribery and Corruption Policy**

### **1. Introduction**

ABL values its reputation for ethical behaviour and reliability. We recognise that any involvement in bribery will reflect adversely on our image and reputation. We, therefore, aim to limit exposure to bribery by:

- Setting out a clear anti-bribery policy;
- Providing awareness training to employees, contractors, suppliers, partners or agents so that they can recognise and avoid the use of bribery by themselves and others;
- Encouraging employees, contractors, suppliers, partners or agents to be vigilant and to report any suspicion of bribery, providing them with suitable channels of communication and ensuring sensitive information is treated appropriately;
- Rigorously investigating instances of alleged bribery and assisting the police and other appropriate authorities in any resultant prosecution;
- Taking firm and vigorous action against any individual(s) involved in bribery

Ultimate responsibility for upholding the Anti-Bribery Policy rests with the Directors of ABL.

### **2. The Policy**

ABL prohibits the offering, the giving, the solicitation or the acceptance of any bribe, whether cash or other inducement to or from any person or company, wherever they are situated and whether they are a public official or body or private person or company by any individual employee, supplier, partner or agent or other person or body acting on the Company's behalf in order to gain any commercial, contractual or regulatory advantage for the Company in a way which is unethical or in order to gain any personal advantage, pecuniary or otherwise, for the individual or anyone connected with the individual.

### **3. Further clarification**

ABL recognises that market practice varies across the territories in which it does business and what is normal and acceptable in one place may not be in another. This policy prohibits any inducement which results in a personal gain or advantage to the recipient or any person or body associated with them, and which is intended to influence them to take action which may not be solely in the interests of the Company or of the person or body employing them or whom they represent.

This policy is not meant to prohibit the following practices providing they are customary in a particular market, are proportionate and are properly recorded:

- normal and appropriate hospitality
- the giving of a ceremonial gift on a festival or at another special time
- the offer of resources to assist the person or body to make the decision more efficiently provided that they are supplied for that purpose only.

Inevitably, decisions as to what is acceptable may not always be easy. If anyone is in doubt as to whether a potential act constitutes bribery, the matter should be referred to the The Managing Director with responsibility for this policy before proceeding. If necessary, guidance should also be sought from the Directors.

#### **4. Employee Responsibility**

The prevention, detection and reporting of bribery is the responsibility of all employees, contractors, suppliers, partners or agents throughout the Company. Suitable channels of communication by which employees or others can report confidentially any suspicion of bribery will be maintained via confidential meetings. Anyone found contravening this policy will be taken through the company disciplinary procedures.

#### **5. Status of this policy and new instructions**

This policy does not give contractual rights to individual employees. The company reserves the right to alter any of its terms at any time although we will notify you in writing of any changes.

#### **6. Other related policies**

Disciplinary Policy  
Whistleblowing Policy  
Corporate Hospitality Policy