BRIBERY & OTHER CORRUPT BEHAVIOUR POLICY

Policy Statement

Michelmersh is committed to ensuring that it carries out its business activities in an open and transparent manner and has a zero-tolerance approach toward bribery. A bribe is defined as: giving someone a financial or other advantage to encourage that person to perform their functions or activities improperly or to reward that person for having already done so.

If you bribe (or attempt to bribe) another person, intending either to obtain or retain business for the company, or to obtain or retain an advantage in the conduct of Company business this will be considered as gross misconduct. Similarly accepting or allowing another person to accept a bribe will be considered as gross misconduct. In these circumstances you will be subject to formal investigation under the Company's disciplinary procedures, and disciplinary action up to and including dismissal may be applied.

Employees must report any illegal activities, wrongdoing or malpractice within the organisation.

End

