

Elite Aluminium Systems Ltd

Leamore Lane, Walsall, West Midlands, WS2 7DQ.

Telephone: 01922 444443 Facsimile: 01922 710837

Email: general@elitesystems.co.uk

8. ANTI-BRIBERY POLICY STATEMENT

Introduction

Bribery is a criminal offence. The Company prohibits any form of bribery. We require compliance, from everyone connected with our business, with the highest ethical standards and anti-bribery laws applicable. Integrity and transparency are of utmost importance to us and we have a zero tolerance attitude towards corrupt activities of any kind, whether committed by Elite Aluminium Systems Ltd employees or by third parties acting for or on behalf of Elite Aluminium Systems Ltd.

Policy

It is prohibited, directly or indirectly, for any employee or person working on our behalf to offer, give, request or accept any bribe i.e. gift, loan, payment, reward or advantage, either in cash or any other form of inducement, to or from any person or company in order to gain commercial, contractual or regulatory advantage for the Company, or in order to gain any personal advantage for an individual or anyone connected with the individual in a way that is unethical.

If we suspect that you have committed an act of bribery or attempted bribery, an investigation will be carried out and, in line with our disciplinary procedure where appropriate, action may be taken against you which may result in your dismissal, or the cessation business arrangements with you.

If you, as an employee or person working on our behalf, suspect that an act of bribery or attempted bribery has taken place, even if you are not personally involved, you are expected to report this to the Managing Director.

You may be asked to give a written account of events. Staff are reminded of the Company's Whistleblowing policy which is available in the Policy Manual or upon request.

Gifts and hospitality

We realise that the giving and receiving of gifts and hospitality as a reflection of friendship or appreciation where nothing is expected in return may occur, or even be commonplace, in our industry. This does not constitute bribery where it is proportionate and recorded properly.

No gift should be given nor hospitality offered by an employee or anyone working on our behalf to any party in connection with our business without receiving prior written approval from a Director. Similarly, no gift nor offer of hospitality should be accepted by an employee or anyone working on our behalf without receiving prior written approval from a Director.

A record will be made of every instance in which gifts or hospitality are given or received.

As the law is constantly changing, this policy is subject to regular review and the Company reserves the right to amend this policy without prior notice.

 Jamie Bayliss – Managing Director

Date: 4 April 2018