



ABIS Holdings Energy Services Ltd

ANTI BRIBERY AND CORRUPTION POLICY

As a result of the Bribery Act 2010 which comes into force on 1 July 2011, ABIS Holdings Energy Services Ltd is reaffirming its commitment to ensuring adherence to the highest legal and ethical standards of business by all employees of the organisation. This must be reflected in every aspect of the way in which we do business. Acts of bribery and corruption seriously damage all business transactions and we must ensure that we bring integrity to all our dealings.

The core of our policy is to conduct all business in an open and honest way without the use of acts of bribery or corrupt practices to obtain an unfair advantage over our competitors.

All employees of ABIS Holdings Energy Services Ltd are made aware from the outset that bribery is a criminal offence and all such offences expose the organisation and its employees to the risk of prosecution, possible fines or imprisonment and also cause serious damage to the company's reputation. We must all bear in mind that the Bribery Act 2010 not only makes bribery and corruption illegal but also holds companies liable for failing to implement adequate procedures to prevent such acts by those working for the company or on its behalf no matter where the act takes place.

In order to maintain the integrity of ABIS Holdings Energy Services Ltd, all employees and contractors will sign a Confidentiality Agreement when they commence employment with the company. Many bribery and corruption offences have been found to involve some degree of inaccurate record keeping. We must ensure that we maintain accurate books, records and financial reporting within our business. False, misleading or inaccurate records of any kind could potentially damage ABIS Holdings Energy Services Ltd. All transactions will be subject to internal control and monitoring.

Gifts, Entertainment and Hospitality

Gifts, entertainment and hospitality include the receipt or offer of gifts, meals or tokens of appreciation and gratitude, or invitations to events, functions or other social gatherings, in connection with matters related to our business. These activities are acceptable provided they fall within reasonable bounds of value and occurrence.

What is "Acceptable"

Employees and contractors must consider the following:

- a) What is the intent – is it to build a relationship or is it something else?
- b) How would this look if these details were on the front of a newspaper?
- c) What if the situation were to be reversed – would there be a double standard?

If you find it difficult to answer one of the above questions, there may be a risk involved which could potentially damage our reputation and ultimately our business. The action may also be illegal.

General Guidelines

Circumstances which are deemed never acceptable include examples that involve:

- a) A "Quid Pro Quo" – offered for something in return
- b) Gifts in the form of cash or cash equivalent vouchers
- c) Entertainment of a sexual or similarly inappropriate nature

Circumstances which are usually acceptable include:

- a) Modest/occasional meals with someone whom we do business with
- b) Occasional attendance at ordinary sports, theatre and other cultural events
- c) Gifts of nominal value such as pens or small promotional items

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AGILE BUSINESS
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SOLUTIONS

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A variety of cultural factors such as customs, currency and expectations may influence the level of acceptability. If you feel unsure at any time regarding these issues you must consult senior management immediately for guidance.

Given the high level of importance attached to this policy, any breach of the policy will be regarded as a very serious matter by the company and is likely to result in disciplinary action.



Managing Director

Date 17th November 2016