

# ANTI-BRIBERY & CORRUPTION POLICY

**ALUCRAFT**  
REFLECTING EXCELLENCE

## Introduction

It is Alucraft Systems Ltd. policy to conduct all our business in an honest and ethical manner. We take a zero -tolerance approach to bribery and corruption and are committed to acting professionally, fairly and with integrity in all our business dealings and relationships wherever we operate and implementing and enforcing effective systems to counter bribery. Alucraft Systems Ltd. expects the same approach from all those with whom we do business.

This policy sets out Alucraft Systems Ltd. position on bribery and corruption.

## Bribery

A bribe is an inducement or reward offered, promised or provided to gain any commercial, contractual, regulatory or personal advantage.

Bribery includes:

- Payments to a company's employees or their relatives, or to those of a third party, to secure a business advantage.
- Gifts, hospitality and expenses made to secure a business advantage.
- Political contributions made to secure a business advantage
- Facilitation payments or "kickbacks" made to secure or accelerate routine or necessary business actions.

## Scope

This policy applies to all Alucraft Systems Ltd. employees and associated persons acting on behalf of Alucraft Systems Ltd. and extends to our business dealings in all jurisdictions within which we operate.

## Policy

Alucraft Systems Ltd. does not engage in bribery or corruption. It is contrary to Alucraft Systems Ltd. policy for an employee or third party acting on behalf of Alucraft Systems Ltd. to request, offer, solicit, make or receive any payments or inducements which are illegal, unethical or represent a breach of trust. Alucraft Systems Ltd. respects all laws relevant to countering bribery and corruption in all the jurisdictions in which we operate, particularly laws that are directly relevant to specific or local business practices.



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Alucraft Systems Ltd. will not do business with any person or company which we know (or have reasonable grounds for suspecting) engages in bribery or corruption.

## Responsibilities

The Board of Directors is responsible for establishing this policy within Alucraft Systems Ltd. which prohibits bribery and corruption involving Alucraft Systems Ltd. employees or any third parties acting on behalf of Alucraft Systems Ltd.

Each Alucraft Systems Ltd. employee receives training in respect of this policy, and it is the responsibility of each Alucraft Systems Ltd. employee to ensure compliance with the terms of this policy. If any employee believes that the terms of this policy are not being correctly adhered to, then they should seek to raise their concerns with their line manager as soon as possible.

## Compliance

Compliance with this policy will be subject to regular review and audit to ensure it remains suitable, effective and proportionate having regard to Alucraft Systems operations and the jurisdictions within which we operate.

Any concerns raised by any person relating to any alleged non-compliance with the terms of this policy will be immediately investigated and if appropriate, action will be taken.

Failure to observe the terms of this policy may constitute a disciplinary offence and may expose individuals to civil or criminal proceedings.



Ian Davy  
Managing Director

12th February 2020

Date