

## Anti-corruption and Bribery Policy

The UK introduced the UK Bribery Act in 2010. Penalties for bribery or corrupt actions can include severe fines and/or imprisonment for individuals, as well as fines and other penalties for companies for failing to prevent an act of bribery.

In addition, any allegations of bribery or corruption could do irreparable damage to Adroit Utilities reputation and credibility. Any activity which throws into question Adroit Utilities integrity as an organisation must be considered when dealing with stakeholders or customers.

In recognition of this the directors of Adroit Utilities have adopted a zero-tolerance approach toward all such practices and developed this anti-bribery policy. We encourage all employees to report any suspicion of bribery and will investigate any instances of alleged bribery.

### Definition

A bribe is a reward, advantage, incentive, assistance or benefit (whether made by monetary payments or in any other form such as favor's', excessive hospitality etc) which is made or offered for the purpose of improperly obtaining or retaining business or for any other improper purpose or commercial advantage. In many countries (including the UK) a payment of this nature to any type of person or organisation (not only to government bodies or officials) can be a bribe. Whether it is made directly or through an intermediary, with or without the recipient's knowledge that it relates to an improper purpose, such a payment is still a bribe.

Adroit utilities must take the appropriate steps to ensure that it and all its directors, employees and those acting on its behalf:

- Meet all legal and regulatory requirements governing the lawful and ethical conduct of business.
- Prohibit directors, employees or persons and entities acting on behalf of Adroit Utilities from receiving, offering, promising, improperly influencing payment, authorising payments, or contract awards, either directly or indirectly, in return for anything of value by means of a bribe, kickback or similar payments;
- Prohibit the use of subcontracts, purchase orders or consulting agreements as a means of channelling such Payments, or otherwise improperly rewarding such persons or their relatives or business associates.
- Ensure all transactions are properly and accurately recorded.
- Ensure all breaches or suspected breaches of this policy are fully investigated and, if appropriate, take disciplinary measures and prompt action to remedy the breach and prevent any repetition.
- Ensure all employees are aware of their personal responsibilities and always conform strictly and to this policy; and
- Provide information to all employees and further guidance if they have any question or uncertainty regarding these requirements.

This Policy is endorsed by Senior management and signed on behalf of Adroit Utilities by

Name: Terence Gormley

Signature: *T Gormley*

Position: Director

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