

ANTI BRIBERY POLICY



HONESTY IS THE ONLY POLICY

Background

Accepting or offering significant gifts or hospitality is not acceptable practice at Rydon and all employees should avoid putting themselves in a position where they could be open to suspicion or accusations of dishonesty.

The Bribery Act 2010, which came into force on 01 July 2011, establishes that it is an offence for anyone working on behalf of an organisation to offer, accept or receive a bribe which results in gaining or retaining business. Anyone found guilty under this Act could face a fine and up to 10 years in jail.

Policy

At Rydon we expect all employees to conduct themselves with integrity, impartiality and honesty at all times. Employees should be aware that gifts and hospitality offered by contractors, suppliers, service providers, students and others may place them and the Company in a vulnerable position.

We understand that offers of this kind may place an employee in a difficult position: to refuse may offend but to accept may give rise to questions of impropriety or conflict of interest. Even when offered or accepted in innocence, others may misconstrue the intention behind such gifts.

Conversely, we expect all members of staff to exercise great care when offering invitations of hospitality or entertainment to clients or prospective clients such that no suggestion of seeking favour or reward can be interpreted.

Whilst we believe that inviting guests for meals or to attend corporate events is a normal part of developing mutual understanding and positive relationships between professionals, such invitations must be restricted and proportional to the actual working relationship between the individuals involved.

The guiding principles at Rydon are:

- The conduct of an individual should not create suspicion of any conflict of interest;
- The behaviour of individuals acting in an official capacity should not give the impression that they have been, or may have been, influenced by a benefit to favour or disfavour to any person or organisation nor that they may be attempting to gain favour by providing entertainment or hospitality.

It is a disciplinary offence for a member of staff to accept or offer any benefit (i.e. gift or hospitality) as an incentive or reward for either doing something or not doing something in their official capacity. Any disciplinary action will be in accordance with the Disciplinary Procedure.

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If an employee is in doubt about accepting or making an offer of a gift or hospitality, they should discuss the situation with their line manager, who will determine whether the gift/hospitality can be offered or accepted and will pass the information on to the Group Legal Director to record on a central register of gifts and hospitality reported. This will minimise the risk of the individual and the company being accused of impropriety.

Governance

All policies within the company are led and overseen by the Group Chief Executive and have director-level representation from each operating company and Corporate Services. Co-ordination of legal matters is the responsibility of the Group Legal Director.

Signed: _____



Robert Bond
Group Chief Executive

Dated: _____

September 2011