

Anti-Bribery Policy

CONDITIONS:	SUBJECT:
1	Introduction
2	Legal obligations
3	The Company
4	Policy statement
5	Bribing a person
6	Accepting a bribe
7	Bribing a foreign public official
8	Failure to prevent bribery
9	Reporting
10	Duty to act
11	Senior management and organization liability
12	Clear communication
13	Date of implementation
14	Questions
15	Alterations to the policy
16	Record keeping
17	Sanctions for breach
18	Monitoring

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Anti-Bribery Policy

1. Introduction

One of the Company's core values is to uphold responsible and fair business practices. It is committed to promoting and maintaining the highest level of ethical standards in relation to all of its business activities. Its reputation for maintaining lawful business practices is of paramount importance and this Policy is designed to preserve these values.

The Company therefore has a zero tolerance policy towards bribery and corruption and is committed to acting fairly and with integrity in all of its business dealings and relationships and implementing and enforcing effective systems to counter bribery.

Purpose and scope of Policy

- A. This Policy sets out the Company's position on any form of bribery and corruption and provides guidelines aimed at: ensuring compliance with anti-bribery laws, rules and regulations, not just within the UK but in any other country within which the Company may carry out its business or in relation to which its business may be connected
- B. enabling employees and persons associated with the Company to understand the risks associated with bribery and to encourage them to be vigilant and effectively recognise, prevent and report any wrongdoing, whether by themselves or others
- C. providing suitable and secure reporting and communication channels and ensuring that any information that is reported is properly and effectively dealt with
- D. creating and maintaining a rigorous and effective framework for dealing with any suspected instances of bribery or corruption.

2. Legal obligations

The UK legislation on which this Policy is based is the Bribery Act 2010 and it applies to the Company's conduct both in the UK and abroad. A bribe is an inducement or reward offered, promised or provided in order to gain any commercial, contractual, regulatory or personal advantage.

3. The Company

This policy document applies to your employment at Workplace Group (UK) LLP, Unit 75 Joseph Wilson Industrial Estate, Millsrood Road, Whitstable Kent CT5 3PS. The "Organisation" and all other Organisation sites that you may be asked to work at from time to time.

This Policy applies to all permanent and temporary employees of the Company (including any of its intermediaries, subsidiaries or associated companies). It also applies to any individual or corporate entity associated with the Company or who performs functions in relation to, or for and on behalf of, the

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Anti-Bribery Policy

Company, including, but not limited to, directors, agency workers, casual workers, contractors, consultants, sub-contractors, seconded staff, agents, suppliers and sponsors ("associated persons"). All employees and associated persons are expected to adhere to the principles set out in this Policy

4. Policy Statement

- A. This Organisation is committed to complying with the Bribery Act 2010 and all legislation that adds to or supersedes the Act.
- B. The Organisation will provide practical advice and training to both new employees and existing employees operating in new territories to make them aware of the risks of bribery.
- C. Where appropriate the Organisation will carry out risk assessments when entering into either a new geographical territory or new product market.
- D. Furthermore the Organisation will undertake due diligence when entering into business with new third parties or engaging third parties to act upon behalf of the Organisation.
- E. The Organisation will continually monitor its policies and practices to ensure that the Act is complied with. Every executive, manager and employee has a responsibility to follow and implement this policy.

5. Bribing a Person

Under the Act it is an offence to directly or indirectly offer, promise or give a financial advantage to another. Where the intention is to induce another person to perform a relevant function or activity improperly or reward such action, or where the acceptance of the bribe itself constitutes improper performance of a relevant function or activity.

6. Accepting a Bribe

It is an offence where a recipient or potential recipient of a bribe requests, agrees to receive or accepts a financial or other advantage with the intention that a relevant function will be performed improperly by them. Or that by agreeing to the above a relevant function is itself performed improperly. Or improper performance is rewarded. Or is improperly performed in anticipation of a bribe. It is irrelevant if the improper performance is carried out by the actual recipient of the bribe or another person.

7. Bribing a Foreign Public Official

It is an offence to offer, promise or give a financial or other advantage to a foreign public official, with the intention of influencing the official in the performance of their official duties. The person offering the bribe must also have the intention to obtain or retain business or obtain an advantage.

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Anti-Bribery Policy

8. Failure to Prevent Bribery

The Organisation will be liable under the Act if a person associated with it bribes another party with the intention of obtaining or retaining business or gaining an advantage.

9. Reporting

All officers, managers and employees have a duty to report all suspicions of bribery, attempts at bribery and actual instances of bribery simultaneously to both their next-in-line in management and directly to the most senior managers or executives within the Organisation.

10. Duty to Act

Any officer, manager or employee that receives such information from either another officer, manager, employee or third party has a duty to ensure that the information received is acted upon and that the information received reaches the most senior managers or executives within the Organisation in a timely manner.

11. Senior Management and Organisation Liability

The Organisation will be liable under the Act if a senior person, such as a managing director, ceo, finance director, member of the board or other senior manager within the Organisation commits an offence under the Act. As the person is in a senior position the Organisation is held liable for their actions.

12. Clear Communication

The Organisation will clearly communicate its stance on bribery to all business partners, agents and any other third parties in order to both promote this policy and put such parties on notice that this policy will be complied with in full and without exception.

13. Date of Implementation

This policy is effective from 01/05/2016 and shall not apply to any actions that occurred prior to this date.

14. Questions

If you have any questions regarding this policy document and how it applies to you please consult Steve Fasulo on 01227 772771.

15. Alteration of this Policy

This policy will be subject to review, revision, change, updating, alteration and replacement in order to introduce new policies from time to time to reflect the changing needs of the business and to comply with legislation. Any alterations will be communicated to you by Steve Fasulo.

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Anti-Bribery Policy

16. Record keeping

All accounts, receipts, invoices and other documents and records relating to dealings with third parties must be prepared and maintained with strict accuracy and completeness. No accounts must be kept "off the record" to facilitate or conceal improper payments.

17. Sanctions for breach

A breach of any of the provisions of this Policy will constitute a disciplinary offence and will be dealt with in accordance with the Company's disciplinary procedure. Depending on the gravity of the offence, it may be treated as gross misconduct and could render the employee liable to summary dismissal.

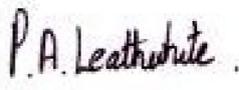
As far as associated persons are concerned, a breach of this Policy could lead to the suspension or termination of any relevant contract, sub-contract or other agreement.

18. Monitoring

The Company's Anti-Corruption Officer has lead responsibility for ensuring compliance with this Policy and will review its contents on a regular basis. They will be responsible for monitoring its effectiveness and will provide regular reports in this regard to the directors of the Company who have overall responsibility for ensuring this Policy complies with the Company's legal and ethical obligations.

Approval for this policy

This statement was approved by the Managing Partner



Philip Leathwhite

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