

# ANTI - BRIBERY AND CORRUPTION POLICY

This document sets out the rules of the Company in relation to anti-bribery and corruption matters in the United Kingdom.

Compliance with the Company's policy in relation to bribery and corruption is regarded as part of your contract of employment. If you fail for any reason to follow the rules set out in this document this may result in disciplinary action being taken against you which could result in your dismissal.

**Bribery** is the offer or receipt of any gift, loan, payment, reward or other advantage to or from any person as an encouragement to do something which is dishonest, illegal or a breach of trust, in the conduct of the Company's business.

**Corruption** is the misuse of entrusted power for private gain.

To place this in context, you should be aware that if you engage in activities which are contrary to UK anti-bribery and corruption legislation, you could face up to 10 years in prison and/or an unlimited fine, and the Company could also be liable to an unlimited fine and Government sanction.

This policy document is not regarded as exhaustive, but does give specific examples of situations and sets out the rules and procedures and which should be followed.

If you are at any time uncertain as to whether your actions will comply with this policy, you must seek guidance from the Company Secretary.

**You should at all times act in accordance with the following provisions:-**

- behave honestly, be trustworthy and set a good example;
- use the resources of the Company in the best interests of the Company and do not misuse those resources;
- make a clear distinction between the interests of the Company and your private interests to avoid any conflict of interest, and if such conflict does arise you should report it to the Company Secretary immediately;
- ensure that any community support, sponsorship and charitable donations do not constitute bribery, and if in doubt you should consult the Company Secretary;
- confidentially report all incidents, risks and issues which are contrary to this policy document to the Company Secretary;

- raise any issues regarding anti-bribery and corruption laws and the Company's policies. Queries will be dealt with anonymously and a written response will be issued;

- Do not offer or accept bribes.

- Do not, without express prior written approval from the Company Secretary, offer or accept any gifts or hospitality to or from clients, contractors, suppliers, other third parties or public officials.

**Gifts** are presents such as flowers, vouchers, food and drink. Event and travel tickets given to you as an individual are also gifts when they are not to be used in a hosted business context.

**Hospitality** includes invitations to hosted meals, receptions and events for business purposes.

- Do not offer money to any public officials in order to speed up service or gain improper advantage. This type of bribery is a 'facilitation payment' and is illegal. If you are faced with a demand for a facilitation payment you must:

1. actively resist the payment;
2. inform the Company Secretary.

**The UK anti-bribery and corruption legislation applies to all activities of a UK-based business no matter where they are carried out in the world. This policy therefore applies to ALL activities worldwide, whatever the local law, practice or custom may be.**

By complying with this policy document we aim to ensure that you and the Company will not at any time knowingly breach any relevant anti-bribery and corruption legislation and also that by adhering to the Policy the Company can demonstrate that it has adequate procedures in place to prevent such activity.

You have an independent obligation to prevent bribery and corruption in the Company and to ensure that any interaction with public officials complies with this policy document and relevant laws.

**Anthony Barry**

Managing Director  
Airvent Systems Services Ltd

## HEALTH AND SAFETY POLICY STATEMENT

- Airvent provide a professional facility for the consultancy, design, supply, installation and maintenance of smoke ventilation products and systems.
- Our aim is to provide a safe working environment for our employees and others who may be affected by our activities. Compliance with legislation is the minimum acceptable standard and we are committed to achieving the highest levels of health and safety performance through continual monitoring, training and cost effective improvement.
- Health and safety is an integral part of our business and has equal status to other aspects of business performance. Appropriate financial and physical resources will therefore be provided to implement this policy.
- We recognise the requirement and responsibility in providing vital health and safety information translated into languages where other nationalities are employed. We have created and translated a Health & Safety Policy for our Eastern Block employees to assist in their understanding of our policy statement.
- We recognise that successful health and safety management can only be achieved with the support and commitment of our employees. All employees will be actively encouraged to take ownership of health and safety and empowered to assist in decision making. Compliance with this policy is a condition of employment.
- We will ensure that these policies are implemented and maintained at all levels throughout the organisation.
- Responsibilities for health and safety are defined in our Health and Safety Management System. The day to day management of health and safety is a responsibility of managers at all levels but overall responsibility rests with the Managing Director.
- To assist with the implementation of our health and safety management system we have appointed a Health and Safety Co-ordinator. External advice will also be obtained where necessary.
- To facilitate continuous improvements in health and safety standards we will identify specific health and safety objectives. Progress towards the objectives will be closely monitored.
- Periodic auditing of our Health and Safety Management System will be undertaken to ensure its continued adequacy and effectiveness.
- The company will review this policy at least annually and revise it as often as is appropriate.