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GROUP ANTI-BRIBERY AND CORRUPTION POLICY

Policy Statement

Fastflow Group's ("Fastflow") core values are committed to upholding responsible and fair business practice, and to acting professionally and with integrity in its business relationships. It does so through promoting and maintaining the highest ethical standards across all its business activities. The Group's reputation for doing so is paramount to its success.

Fastflow is committed to the deterrence, detection, and prevention of bribery, and has a zero tolerance policy regarding its occurrence at any level. All employees and associated persons are required at all times to:

- comply with the anti-bribery and anti-corruption legislation that applies in any jurisdiction in any part of the world in which they might be expected to conduct business;
- act honestly, responsibly and with integrity; and
- safeguard and uphold the Group's core values by operating in an ethical, professional and lawful manner.

Bribery of any kind is strictly prohibited. Under no circumstances will any provision be made, money set aside or accounts created for the purposes of facilitating the payment or receipt of a bribe.

Purpose and Scope of Policy

This Policy sets out the Group's position and responsibilities, including of those working for it, to address bribery and corruption. It provides guidelines aimed at:

- ensuring compliance with anti-bribery laws, rules and regulations;
- enabling employees and persons associated with the Group to understand the risks associated with bribery, encouraging them to be vigilant and to be able to recognise, prevent and report any wrongdoing, whether by themselves or for others;
- providing suitable and secure reporting and communication channels, ensuring that any information that is reported is properly and effectively dealt with;
- creating and maintaining a rigorous and effective framework for dealing with any suspected instances of bribery or corruption.

Compliance with this Policy

This Policy applies to all permanent and temporary employees of Fastflow, (including any of its intermediaries, subsidiaries or associated companies), working for or on our behalf in any capacity.

This includes any individual or corporate entity associated with the Group or who performs functions in relation to, or for and on behalf of the Group, including but not limited to: directors, officers, agency workers, seconded workers, casual workers, volunteers, interns, contractors, consultants, agents, third party representatives and business partners, suppliers and sponsors, or any other person

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associated with us wherever located (“associated persons”).

All employees and associated persons are expected to adhere to the principles set out in this Policy.

Responsibility for this Policy

The board of directors has overall responsibility for ensuring this Policy complies with our legal and ethical obligations, and that all those under the Group's control comply with it.

The Group Director has primary day-to-day lead responsibility for ensuring compliance with the Policy, monitoring its use and effectiveness, and for reviewing its contents on a regular basis.

- (S)he will work with the Business Standards Director, HR and Finance teams across the Group to ensure systems and procedures are effective in countering bribery and corruption.
- (S)he will provide regular reports to the Group board.

Directors and management within each subsidiary company at each level are responsible for ensuring those persons reporting to them understand and comply with this Policy.

Bribery and Corruption

A bribe is an inducement or reward offered, promised or provided in order to gain any commercial, contractual, regulatory or personal advantage. Corruption is the abuse of entrusted power or position for private gain.

Legal Obligations

There are three broad categories of offences that may be committed under the Bribery Act 2010: General bribery offences; Bribery of foreign public officials; Failure of commercial organisations to prevent bribery. The offences set out within this Policy are not exhaustive, and should a case arise then the specific legislation and circumstances will need to be considered in detail.

Individuals found guilty of offences may be liable to significant terms of imprisonment or fines. As an employer, if we fail to prevent bribery we also can face an unlimited fine or exclusion from tendering for public contracts, and damage to our reputation. We therefore take our legal responsibilities very seriously.

The general bribery offences include that of bribing another person, and to being bribed.

- It is an offence to: offer, promise or give a financial or other advantage (money, gifts, loans, fees, hospitality, services, discounts, and the award of a contract or anything else of value to another person), i.e. bribe a person, either directly or through a third party:
 - With the intention of inducing any person to perform improperly (act illegally, unethically, or contrary to an expectation of good faith or impartiality, or where they abuse a position of trust), or to reward any person for the improper performance of a function or activity;
 - Knowing or believing that acceptance of the advantage would itself constitute

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improper performance of a function or activity.

- It is an offence to request, agree to receive or accept a financial or other advantage for any person, i.e. receive a bribe, either directly or through a third party:
 - Intending that a relevant function or activity should be performed improperly by someone;
 - Where doing this itself constitutes the improper performance of a relevant function or activity;
 - As a reward for the improper performance of a function or activity by someone;
 - In anticipation of or in consequence of the request, agreement or receipt of the advantage, then a function or activity is performed improperly.

Failure of the Group to prevent bribery may also constitute an offence, if a person associated with the Group bribes another person intending to obtain or retain business, or to obtain or retain an advantage in the conduct of business. Such persons may include any person who performs services for and on behalf of the Group, all employees, agents or subsidiaries.

Fastflow recognises that industry practices vary from culture to culture. What is considered unacceptable in one place may be normal or usual practice in another. Nevertheless, a strict adherence to the guidelines set out in this Policy is expected of all employees and associated persons at all times. If in doubt as to what might amount to bribery or what might constitute a breach of this Policy, you must refer the matter to your line manager, the HR team or to the Business Standards Director / Group Director.

Facilitation payments and kickbacks

Fastflow does not make nor will it accept facilitation payments or 'kickbacks' of any kind:

- A facilitation payment or gift, of whatever size, is an unofficial payment made to secure or expedite a routine or necessary action, for example by a Government official.
- Kickbacks are payments made in return for a business favour or advantage.

Employees must avoid an activity that might lead to a facilitation or kickback payment being made or accepted by the Group on its behalf, or that suggest that such a payment will be made or accepted.

Where employees are asked to make payments, you should be mindful of what the payment is for and whether the amount is proportional to the goods and services being provided. Employees should always ask for a receipt which details the reasons for payment.

Gifts, hospitality and expenses

The giving of business gifts to clients, customers, contractors and suppliers are not in themselves unlawful, provided the following requirements are met:

- the gift is not made with the intention of influencing a third party to obtain or retain business

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or a business advantage, or to reward the provision or retention of business or a business advantage, or in exchange for favours or benefits;

- it complies with local laws
- it is given in the Group or subsidiary company's name, not in the giver's personal name
- it does not include cash or a cash equivalent (such as gift vouchers)
- it is of an appropriate and reasonable type and value, and given at an appropriate time
- it is given openly, not secretly
- it is approved in advance by a director of the Group / subsidiary company.

This Policy allows reasonable and appropriate hospitality or entertainment given to or received from third parties for the purposes of: maintaining good business relationships; maintaining our image and reputation, or effective marketing. Reimbursing a third party's expenses, or accepting an offer to reimburse our expenses, e.g. the costs of attending a business meeting, would not usually amount to bribery. However, a payment in excess of genuine and reasonable business expenses is not acceptable.

Record-Keeping

The Group will keep financial records and have appropriate internal controls in place which will provide evidence of the business reasons for making payments to third parties.

Employees must submit all expense claims relating to hospitality, gifts or payments to third parties in accordance with the Group's expenses procedures and record the reason for the expenditure. This will be subject to managerial review.

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

Employee responsibilities

All employees must read, understand, and comply with this Policy as you have individual liabilities under the law.

It is the contractual duty and responsibility of all employees and associated persons to take whatever reasonable steps are necessary to ensure compliance with this Policy and to avoid any activity that might lead to, or suggest a breach of this Policy.

It is also the responsibility of all those working for the Group and under its control to prevent, detect and report suspected bribery and other forms of corruption.

Employees must immediately disclose to the Group any knowledge or suspicion you may have that you, or any other employee or associated person has, plans to offer, promise or give a bribe, or to

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request, agree to receive or to accept a bribe in connection with the business of the Group. For the avoidance of doubt, this includes reporting your own wrongdoing. The duty to prevent, detect and report any incident of bribery and any potential risks rests not only with the directors of the Group / subsidiary companies but equally to all employees and associated persons.

If you are unsure about whether a particular act constitutes bribery or corruption, raise it with your manager, the HR team or the Business Standards Director.

Raising a concern

The Group encourages all employees and associated persons to be vigilant and to report any unlawful conduct, suspicions, or concerns promptly and without undue delay, including of bribery and corruption, so that investigations may proceed and actions be taken expeditiously.

In the event that an employee wishes to report an instance or suspected instance of bribery, corruption or other breach of this policy, employees should contact either the HR team, the Business Standards Director or the Group Director.

Confidentiality will be maintained during the investigation to the extent that this is practical and appropriate in the circumstances. The Group is committed to taking appropriate action against bribery and corruption. This could include either reporting the matter to an appropriate external government department, regulatory agency or the police, and/or taking internal disciplinary action against relevant employees, and/or terminating contracts with associated persons.

Protection of employees

Individuals who refuse to accept or offer a bribe, or who raise concerns or report another's wrongdoing, are sometimes worried about possible repercussions. The Group will support anyone who raises genuine concerns in good faith under this Policy, even if they are mistaken.

The Group is also committed to ensuring nobody suffers any detrimental treatment as a result of refusing to take part in bribery or corruption, or because of reporting in good faith their suspicion that an actual or potential bribery or corruption offence has taken place or may take place in the future. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising concerns.

Employees who believe they have suffered such treatment should inform the HR Team / Business Standards Director immediately.

Breaches of Policy

A breach of any of the provisions of this Policy will constitute a disciplinary offence, and the employee will face disciplinary action in accordance with the Group's disciplinary procedure. Depending on the gravity of the offence, this may be treated as gross misconduct and could render the employee liable to summary dismissal. As far as other associated persons are concerned, a breach of this Policy could lead to the suspension or termination of any relevant contract, sub-contract, other agreement or relationship.

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