



Ravensden Plc — Anti-Bribery Policy

Purpose & Scope

Like all businesses, Ravensden is subject to laws that prohibit bribery. The purpose of this policy is to set out the rules that must be followed to ensure that no bribery occurs.

The rule within the Organisation is simple - don't bribe anybody, anytime, for any reason. Equally you should not accept bribes from anyone, at any time, for any reason.

Unacceptable Behaviour

The following behaviour is unacceptable and must not occur;

- You must not accept, request or receive a bribe from anyone.
- You should not provide or receive gifts or any inducement that could be perceived as a bribe to suppliers and / or customers either directly or indirectly via a third party.
- You must not bribe another person by offering a "financial or other advantage" to procure or reward improper exercise of a business activity.
- You must not bribe a foreign and / or public official to win or retain business.
- If you are aware of inappropriate activity which constitutes bribery, it is your duty to report this immediately to a Director.

Failure to comply with this policy will result in disciplinary action, the outcome of which is likely to be Gross Misconduct, which may result in dismissal.

Business Gifts

From time to time, customers, suppliers or other persons may offer a gift to an employee. This could be a small item, e.g. a pen, or something of considerable value, e.g. a holiday.

All gifts received must be recorded.

If a gift is offered and then refused because of its value, this must be reported to your manager immediately.

Ravensden Plc

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Registered in England and Wales number 1206928.

Hospitality

From time to time, customers, suppliers or other persons might invite an employee to a hospitality event. All such invitations must be reported to a Director and recorded.

Directors' Responsibilities

It is the Directors' responsibility to ensure that all existing and new employees are aware of this policy.

All new employees will receive a briefing as part of their induction to inform them of the Anti-Bribery Policy.

Directors must keep a record of any business gifts received by their employees.

Directors must keep a record of any business gifts refused by their employees

Donations to Organisations

No donations should be made to charities, political parties or other organisations with the intention of gaining a business advantage.

Expenses

Directors must check and authorise all expense claim requests from employees. Any items of expenditure that give rise to concern should be fully investigated.

Attempts to Bribe

Any employee who is concerned that he or she is potentially being bribed should report the matter immediately to a Director.

Raising Concerns

If any employee is concerned that acts of bribery are occurring within Ravensden or have occurred at any time, they should inform a Director.

Disciplinary Action

Any employee found to have offered, accepted or requested a bribe will face disciplinary action which may result in dismissal for Gross Misconduct.

If you are aware of inappropriate activity which constitutes bribery, it is your duty to report this immediately to a Director. Failing to report this, is unacceptable and will result in disciplinary action.

Top Level Commitment

The Directors, and ultimately the Managing Director are committed to preventing Bribery and fostering a culture within Ravensden in which Bribery is never acceptable.