

As Group Managing Director, leading the members of the Board of Directors of the SWGR Group of Companies, I am committed to ensuring that the SWGR Group have an avenue to report any wrong doing under the guidelines of this policy and are committed to maintaining the highest standards of honesty, openness and accountability .

This policy statement provides a framework within which staff must operate to avoid committing an offence under the Bribery Act 2010 (the 'Act').

The Act creates the following offences relevant to SWGR Ltd.

- Paying bribes – it is an offence to offer, promise or give a bribe (so-called "active bribery")
- Receiving bribes – it is an offence to request, agree to receive or accept a bribe (so-called 'passive bribery')

A person who is convicted of an offence of paying a bribe or receiving a bribe is liable on conviction to a maximum penalty of 10 years imprisonment and a fine or both.

A corporate offence is where a commercial organisation or associated person fails to prevent persons performing services on its behalf from committing bribery. SWGR Ltd would be guilty of this offence if the person who performs a service on behalf of the organisation bribes another person intending;

- A. to obtain or retain business for SWGR Ltd; or
- B. to obtain or retain an advantage in the conduct of business for SWGR Ltd.

If an organisation is found guilty of corporate bribery, both the organisation and its managers and / or directors could be subject to criminal sanctions. An 'associated person acting on behalf of the company could potentially include SWGR Ltd directors, staff, agents and sub-contractors.

Acts of bribery or corruption are designed to influence an individual in the performance of their duty and incline them to act dishonestly. Bribes can take on different shapes and forms and often both parties will benefit. A bribe can involve a direct or indirect promise or offer of something of value, the offer or receipt of a loan, fee or reward or other advantage and / or giving of aid, donations or voting with the intention of exerting improper influence.

SWGR LTD POLICY STATEMENT

It is SWGR Ltd policy to conduct its business in an open, honest and transparent way and without the use of corrupt practices or acts of bribery to obtain an unfair advantage. SWGR Ltd is committed to adherence to the highest legal and ethical standards and this must be reflected in every aspect of the way in which SWGR Ltd operate.

All staff will receive training which will enable them to be effective in the discharge of their responsibilities.

The company does not preclude the acceptance of hospitality, gifts or entertainment so long as they are reasonable. Limits are prescribed in the policy. The acceptance or commission of a bribe is considered to be an act of gross misconduct and renders that member of staff liable to disciplinary action if found guilty.

GIFTS, ENTERTAINMENT AND HOSPITALITY

Gifts, entertainment and hospitality include the receipt or offer of gifts, meals, invitations to events and functions in connection with matters relating to SWGR Ltd business. These activities are acceptable provided they fall within reasonable bounds of occurrence and value.

Routine inexpensive and very occasional gifts, entertainment and hospitality are acceptable whereas lavish or extraordinary gifts, entertainment and hospitality are not.

Before accepting or giving a gift, staff must always be aware as to the intent.

- Is it to build a relationship or is it something else?
- How would this look to the 'reasonable person in the street'?

If you find it difficult to answer these questions there may be a risk involved and the risk could be unlawful. If you are in any doubt, in the first instance contact the Managing Director immediately.

Gifts, entertainment and hospitality that are never acceptable include where something is offered for something in return. Gifts of cash or cash convertible items are expressly prohibited.

AWARDING A CONTRACT FOR GOODS OR SERVICES (PROCUREMENT)

Staff dealing with or using other parties must be aware of the possibility of being influenced to engage in or facilitate bribery. Staff could, for instance, receive excessive hospitality or gifts in order that they, on the company's behalf, give business to the other party. Staff must not accept any gift, hospitality or entertainment which is, or could be, construed as being designed to influence you in the performance of your job and / or to influence you to act dishonestly.

Modest entertainment or invitations to events as part of pre-contract negotiations are likely to be acceptable but in every event your line manager must be informed.

DONATIONS

SWGR Ltd do not make contributions to political organisations. SWGR Ltd only make charitable donations that are legal and ethical under local laws and practices. No donation must be offered or made without the prior approval of the Managing Director.

MEDIA AND COMPLAINTS

Any member of staff who is contacted by the media or is the subject of any complaint in respect of bribery allegations should report that immediately to the Managing Director.

INTEGRITY OF STAFF

SWGR Ltd recognises that a good standard of staff recruitment and vetting is important in order to reduce the risk of employing staff who are easily persuaded and / or willing to engage in corrupt practices, including bribery and fraud.

TRAINING

Staff will receive a briefing on the act upon induction or once if currently employed. Ad-hoc briefing talks re-emphasising the policy.

HOW TO RAISE A CONCERN

All staff have a responsibility to help detect, prevent and report instances not only of bribery but also of any other suspicious activity or wrongdoing. SWGR Ltd is committed to ensuring that all staff have a safe, reliable and confidential way of reporting any suspicious activity. If any staff member has a concern regarding a suspected instance of bribery or corruption they must notify the Managing Director.

Signed



Raj Sinha
Group Managing Director