



Anti-Bribery and Corruption Policy

August 2012

43 Hullbridge Road, South Woodham Ferrers, Chelmsford

Essex, CM3 5NG

Atom Tiles & Kitchens Limited and its subsidiary companies ("the Group") values its reputation for ethical behaviour and integrity. Conducting business with a zero tolerance approach to all forms of corruption is central to these values, the Group's image and reputation. The policy below sets out the standards expected of all Group employees in relation to anti-bribery and corruption. In particular, all employees must adhere strictly to relevant laws in this area, including The Bribery Act 2010.

The Policy is also relevant for third parties who perform services for or on behalf of the Group. The Group expects those persons to adhere to the Policy or have in place equivalent policies and procedures to combat bribery and corruption. The Policy should be read in the context of a number of other measures that the Group has in place to ensure there is effective communication about anti-corruption issues in connection with its business. These include:

- Providing training to employees on anti-bribery issues
- Writing to persons and companies associated with the Group to set out the Group's approach to anti-corruption
- Additional steps to encourage all employees to be vigilant and to report any suspicion of bribery. In this regard, the Group promotes a number of channels of communication for employees to raise concerns as follows:
 - Group Director: 01245 328003
 - Group Secretary: 01245 328003
 - Whistleblowing Helpline: 0207 696 5957
- The Group will ensure any concerns are investigated appropriately and any employee making a report in good faith shall suffer no detriment for doing so.

The Group will take firm action against any individuals or other parties that it discovers are involved in bribery. Any breach of the Policy by employees will result in disciplinary action under the Gross Misconduct provisions of the Group's Disciplinary and Dismissal Procedures which can include the sanction of summary dismissal in any case where an employee has been found to have paid or received a bribe.

Failure by any employee to report corrupt activity by other persons can also result in disciplinary sanctions, especially where there is evidence that an employee has attempted to cover up or disguise another's wrongdoing.

THE POLICY

The Group has a zero-tolerance policy towards corruption of all kinds.

Employees should note that it is a criminal offence to offer, promise, pay, request or accept a bribe. A bribe does not need to be a monetary sum. It can be any form of advantage, offered or received.

A contract does not need to have been won for a corruption offence to have been committed. Similarly, a recipient does not need to benefit personally from a bribe. Bribery can occur in the private and public sector.

The Policy consists of two straightforward rules that all employees must adhere strictly to:

- Do not offer, promise or pay bribes.
- Do not request, agree to or accept bribes.

The risks of corruption are not always obvious. Accordingly, employees should follow these principles:

- Do not make payments to someone (or favour them in any other way) if you know that this will involve someone in misuse of their position (or them performing their functions improperly).
- Do not misuse your position (or perform your functions improperly) in connection with payments (or other favours) for yourself or others.
- Do not deliberately use advantages to try to influence foreign public officials for business reasons. If you need to promote the Group's business with a foreign public official, always check in advance with the Group Solicitor.

Reasonable and Proportionate Gifts and Hospitality

This Policy is not meant to prohibit the giving or receiving of reasonable and proportionate gifts and hospitality subject to the following:

- They are appropriate in all the circumstances and there is no risk or perception that they might improperly influence the recipient.
- They do not contravene any rules applying to the individual to whom the hospitality or gift is offered (i.e. any policy that another organisation has in place) or any laws applying to that other person.
- The expenditure in question is not related in time to some actual or anticipated business with the recipient, particularly in a competitive context.
- In the case of hospitality provided or received, it is intended to foster cordial relations to has legitimate marketing purposes; and:
 - The level of hospitality is appropriate with regard to the recipient and their organisation.
 - There are no "add-ons" such as inappropriate overnight accommodation, travel costs, or sundry or lavish expenses.
- In the case of gifts, these should never be cash and must be modest at all times, such as a token of appreciation on a festival or at another special time such as the opening of a development, completion of transaction topping out etc, and where there is no risk of them being misconstrued as a reward, an inducement or other corrupt act.
- In the case of any gift or hospitality to be provided to a public official, this must also be approved in advance by the **Group Director/Group Secretary**.
- All offers of hospitality and gifts given or received must be recorded at subsidiary or Group function level in a register maintained by the Managing Director or Head of each Group Function and such registers, together with any associated reports, must be submitted half yearly to the Group Secretary as part of the Internal Controls reporting procedure and thence to the Atom Tiles & Kitchens Ltd Audit Committee.

Seeking further guidance

Inevitably, decisions as to what is acceptable may not always be easy. If any employee is in doubt as to whether a potential act could give rise to corruption concerns, the matter should be referred immediately to the local senior manager with responsibility for this Policy before proceeding. If necessary, guidance should also be sought from either Group contacts.

Sponsorship, Charitable and Political Donations

All Sponsorship and donations made on behalf of the Group must be approved in advance by the Group Managing Director.

Facilitation Payments

Facilitation payments are bribes and prohibited by this Policy. They are typically small unofficial payments paid to speed up an administrative process or secure a routine government action by an official and are most frequently encountered in foreign jurisdictions with perceived high corruption risks. Where an employee (or someone acting on behalf of the Group) suspects a demand for a payment is a request for a facilitation payment, this must be reported immediately to the Group Solicitor.

Record-Keeping

The Group must keep accurate financial and other records and have appropriate internal controls in place which will evidence the business reason for making payments to any third parties (such as anyone who provides services for or on behalf of the Group). Employees must apply the principles enshrined in this Policy in all aspects of their work.

Responsibilities

Employees must read, understand and comply with this Policy. The Group Board has overall responsibility for ensuring this Policy complies with the Group's legal and ethical obligations and to ensure everyone in the Group complies with it. The **Group Director and Group Secretary** have primary responsibility for implementing this Policy and monitoring its effectiveness. Management at all levels are responsible for ensuring those reporting to them are made aware of and understand this Policy and are given adequate and regular training on it.

Ian Charles Wright - April 2011

- *Definition: The receiving/offering/giving/providing/requesting/accepting of a financial or other advantage, in order to seek to induce a person or to induce a person to give improper assistance in breach of their duty, or to otherwise influence someone with the underlying purpose of obtaining/retaining business, or an advantage in the course of business. "Bribery" for this purpose includes so-called "facilitation" or "grease" payments, defined as non-discretionary payments made to government or public officials to speed up routine administrative processes, even if such payments are nominal in amount.*
- *Definition: The misuse of entrusted power/breach of duty for personal gain*

Agreed & Signed,



Ashleigh Lambert
Director