

ADAS Anti-Bribery and Anti-Corruption Policy



Aim:

ADAS has a zero-tolerance policy to bribery and corruption. The Company is committed to complying with applicable anti-corruption laws in all countries in which ADAS does business. We aim to conduct business with the utmost integrity, honesty, transparency and professionalism at all times and never resort to illegal practices. This policy applies to all the Company's business dealings and transactions in all countries in which it operates. It also applies to third parties that perform work on behalf and for the benefit of ADAS.

Definitions:

Bribery is defined as 'Offering, promising or giving anything of value to improperly influence another person in order to obtain business for ADAS or requesting or accepting anything of value as a reward for or as an inducement to act improperly in relation to the awarding of business by ADAS'. Bribes can include money, gifts, hospitality, expenses, reciprocal favours, political or charitable contributions or any direct or indirect benefit or consideration.

Corruption is defined as 'The abuse of entrusted power for private gain'.

Facilitation payments are defined as 'Small unofficial payments made to induce a public official to speed up routine governmental action such as processing licences, permits or other official documents'.

Actions:

- Comply with all applicable anti-bribery and anti-corruption laws, including the UK Bribery Act 2010, in all countries in which the company operates.
- Prohibit all forms of bribery, including through third parties such as agents, sub-contractors and collaborators, where the objective would be to derive commercial advantage.
- Implement an anti-bribery and anti-corruption code of conduct.
- Employees are prohibited from soliciting, arranging or accepting bribes intended for personal benefit or that of family, friends, associates and acquaintances.
- Neither the Company nor its employees will make direct or indirect contributions to political parties, charities, organisations or to individuals involved in politics as a way of gaining business advantage for the company.
- The giving or receiving of any gifts, hospitality, facilitation payments or other expenses that could influence or be perceived of influencing a business transaction is strictly prohibited.
- Recognise that facilitation payments are illegal.
- Reimbursement of travel expenses must be solely for bona fide business purposes.
- Small gifts and business related hospitality will only be accepted in accordance with a prescribed procedure.
- Bribery and corruption will be included in project risk assessments for all work overseas.
- Due diligence of third parties that act on behalf of ADAS will be carried out before the third party is engaged.
- Employees must report concerns about bribery by other employees and third parties and will not be penalised for doing so.

Responsibilities:

All Company directors and employees are required to comply with this policy. Breaching it risks disciplinary action and criminal sanctions.



Ian Strudwick
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