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ANTI BRIBERY AND CORRUPTION POLICY STATEMENT

Dave Mac Propshafts llp (DMP) recognizes that bribery and corruption are damaging to legitimate business interests. This has a detrimental impact on business by undermining good governance and distorting fair business practice.

The purpose of this document is to set out the Company Policy in relation to Bribery and Corruption. The Policy applies to all employees, directors, agents, consultants, contractors, customers and to any other people or bodies associated with DMP, irrespective of their location.

In essence DMP is committed to :-

- o A zero tolerance approach to Bribery and Corruption
- o Acting in a fair, ethical and honest manner with all our employees and business associates.
- o Maintaining a rigid Anti Bribery and Corruption Policy
- o Upholding all National and International laws in respect of Bribery and Corruption.

We conduct all our business in an honest and ethical manner and we want to ensure that all our associates and business partners do likewise.

DMP is committed to applying the highest standards of ethical conduct and integrity in its business activities. Every employee and individual acting on the company's behalf is responsible for maintaining the company's reputation and for conducting business honestly and with complete professional integrity.

The company benefits from carrying out business in a transparent and ethical way and has zero tolerance in regard to any form of bribery or corruption, whether direct or indirect, by any of its employees, officers, customers, agents, consultants, sub contractors or any persons or companies acting on its behalf. If necessary the company is prepared to undertake due diligence on third parties to ensure they operate to the highest ethical standards and that any actions undertaken by them will not compromise the company or damage its reputation by association.

The partners and senior management are committed to implementing and enforcing effective systems to prevent and eliminate bribery in accordance with the 'Bribery Act 2010'.

The company has issued an anti-bribery and corruption policy. This policy covers the receipt or giving of gifts and corporate hospitality and outlines the company's position in regard to preventing and prohibiting bribery and corruption. These Policies apply to all employees and business associates..

A bribe is defined as a financial advantage or other reward offered, given, or received by an individual or company either directly or indirectly to induce or influence an individual or company to perform public or corporate functions or duties improperly.

Employees and others acting for or on behalf of the company are strictly prohibited from making, soliciting or receiving any bribes or unauthorized payments. As part of its anti-bribery measures, the company accepts transparent, proportionate, reasonable and bona fide hospitality and promotional expenditure, whether given or received.

A breach of these Policies by any employee will be considered as an act of gross misconduct and may, if proven, result in summary dismissal. Employees and other individuals acting for the Company are aware that bribery is a criminal offence that may result in a custodial sentence and personal fine as well as an unlimited fine for the Company.

The Company will not conduct business with suppliers, sub contractors, agents or representatives that do not support appropriate anti-bribery and corruption policies. The success of the Company's anti bribery and corruption measures depends on all employees, customers, sub contractors and suppliers adhering to this policy. The prevention, detection and reporting of bribery or corruption is the responsibility of all employees. If any employee becomes aware or suspects that an activity or conduct which is proposed or has taken place is a bribe or corrupt, then they have a duty to report this.

All employees and others acting for, or on behalf of, the company are encouraged to report any such incidence to a director or officer of the company. We encourage whistleblowers and the company will unequivocally support any individual who, in good faith, contacts us and reports any suspicious incidences of malpractice or wrongdoing in regard to this policy.

Any such reports will be treated in strictest confidence.

John McMahon Managing Partner, Dave Mac Propshafts Llp

16 April 2018