



Anti-Corruption Policy

Introduction

At the Kenton Group we appreciate the importance of ethical behaviour to our relations with stakeholders and we are proud of our high ethical standards, but we cannot be complacent about the threat of bribery and corruption in our business. Our first business principle deals with 'integrity in corporate conduct' which commits us to implement anti-corruption policies and procedures. Our second business principle 'ensuring openness and transparency' commits us never to engage in bribery, any form of unethical inducement or payment including facilitation payments and 'kickbacks'.

This policy is part of those commitments.

The UK Bribery Act 2010 and the US Foreign Corrupt Practices Act 1977 create offences and penalties for bribery and corruption.

The UK Bribery Act 2010 creates a corporate offence of failure to prevent bribery, and requires the Kenton Group to implement 'adequate procedures' to prevent bribery.

This policy sets out the responsibilities of Kenton Group's people and Kenton's businesses in preventing bribery and corruption and how we will implement 'adequate procedures' to do so.

In developing this policy reference has been made to Transparency International's 'Business Principles for Countering Bribery'.

Definition


For the purposes of this policy, bribery occurs when one person offers, pays, seeks or accepts a payment, gift, favour, or a financial or other advantage from another to influence a business outcome improperly, or to induce or reward improper conduct. Bribery and corruption – whether involving government officials, or commercial entities, including joint ventures – can be direct or indirect through third parties like agents, brokers and joint venture partners. It includes facilitation payments even though in some countries facilitation payments are legal.

Scope

Under the UK Bribery Act 2010, the Kenton Group is required to put procedures in place to prevent bribery by any individual or organisation that performs services for or on behalf of the Company. Consequently, this policy applies to every employee, contractor, director and officer within the company and in every joint venture company under the Kenton Group's control.

Contractors, consultants or suppliers who are our agents or who are working on our behalf or in our name, through outsourcing of services, processes or any business activity, will be required to act consistently with this policy when acting on our behalf. Independent contractors, consultants or suppliers will be made aware of this policy

as it applies to our people in their dealings with them. Our responsible procurement and supplier management policy will also continue to apply to suppliers. Joint venture companies not under the Kenton Group's control and joint venture partners are encouraged by the Kenton Group to adopt a similar policy, and adequate procedures, to prevent bribery.



Signed:

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John Larkin

Managing Director

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