

AEI Cables Limited

Anti-Bribery Policy

Introduction

AEI Cables is proud of its reputation for ethical behaviour and for financial probity and reliability. We recognise that over and above the commission of any crime any involvement in bribery will tarnish our image and reflect adversely on our reputation. Our aim is to limit exposure to bribery by;

- Setting out a clear anti-bribery policy
- Ensuring employees are fully aware of the policy and how to recognise bribery and what action to take
- Encouraging all employees to be vigilant and to report any suspicion of bribery
- Ensuring appropriate information channels are available and ensuring sensitive information is treated appropriately
- Rigorously investigating instances of alleged bribery
- Assisting the police and other appropriate authorities
- Taking firm action against any individual(s) involved in bribery, bribery offences will constitute gross misconduct for which the penalty can be dismissal.

Under the UK Bribery Act 2010, bribery and corruption is punishable for individuals by up to ten years imprisonment.

If the Company is found to have taken part in the corruption or lacks adequate procedures to prevent bribery, it could face unlimited fines and be excluded from tendering on major contracts and face untold damage to its reputation.

What is Bribery

Bribery and corruption has a range of definitions in law but the fundamental principles apply universally.

Bribery is the offer, promise, giving, demanding or acceptance of an advantage as an inducement for an action which is illegal, unethical or a breach of trust.

Corruption is the use of public office or power for private gain or misuse of private power in relation to business.

Policy

The Company prohibits, the offering, giving, solicitation or acceptance of any bribe whether monetary or other inducement

To or from, any individual or company, wherever they are situated and whether they are a public official or body or private person or company

By any, individual employee, agent or other person acting on the company's behalf

In order to, gain any commercial, contractual or regulatory advantage for the company in a way that is unethical

Or in order to, gain any personal advantage, pecuniary or otherwise, for the individual or anyone connected with the individual

This policy is not meant to prohibit the following practises

Normal and appropriate hospitality (given or received)

The giving of a ceremonial gift, on a festival or at any other special time.

Inevitably decisions on what may or may not be acceptable may not always be easy. Normal practise must be that your Line Manager prior to acceptance shall approve any offers of hospitality. *Any gifts received must also be declared to your Manager, if inappropriate they will be retained by the company and distributed to a charity. Each Manager will discuss the appropriateness of any gifts received with the Personnel Manager who shall maintain a Company Register of gifts received.*

Employee Responsibility

The prevention, detection and reporting of bribery is the responsibility of all employees throughout the company. Suitable channels via the Personnel Manager are available by which employees can report confidentially any suspicion of bribery.

Clive Sharp

CEO

1st November 2011