

002 Anti-Bribery and Corruption Policy

Whoever we may deal with and wherever we may operate we are committed to doing so lawfully, ethically and with integrity. As part of this commitment all forms of bribery and corruption are unacceptable and will not be tolerated. We must ensure that any third party acting on our behalf does not act corruptly in dealing with any other person.

This policy sets out Five Environmental Ltd.'s commitment to prevent acts of bribery and corruption. This policy has been designed to comply with legislation governing bribery and corruption on a global basis.

This policy provides guidance on the standards of behaviour to which we must all adhere and most of these reflect the common sense and good business practices that we all work to in any event. This policy is designed to help you to identify when something is prohibited so that bribery and corruption is avoided and provide you with help and guidance if you are unsure about whether there is a problem and you need further advice.

This policy applies to all Five Environmental Ltd.'s officers, employees (full, part time & self-employed) and temporary workers (such as consultants or contractors) no matter where they are located or what they do. It is the responsibility of each of us to ensure that we comply with these standards in our daily working lives. This policy sets out a single standard that all of us must comply with, regardless of whether local law or practices might permit something to the contrary.

Failure to comply with this policy, whether or not this is intentional, may lead to disciplinary action (up to and including dismissal) and criminal liability for the individual involved. All employees and workers are required to confirm that they have read and understood the policy and that they comply with its terms and part of their ongoing employment.

What is a bribe?

Bribery involves the following:

- When a financial or other advantage is offered, given or promised to another person with the intention to induce or reward them or another person to perform their responsibilities or duties improperly.
- When a financial or other advantage is requested, agreed to be received or accepted by another person with the intention of inducing or rewarding them or another person to perform their responsibilities or duties inappropriately.

It does not matter whether the bribe is:

- Given or received directly or through a third party or
- For the benefit of the recipient or some other person.

Bribes can take many forms, for example:

- Money (or cash equivalent such as shares);
- Unreasonable gifts, entertainment or hospitality;
- Kickbacks;
- Unwarranted rebates or excessive commissions (e.g. to sales agents or marketing agents);

- Unwarranted allowances or expenses;
- Facilitation payments/payments made to perform their normal job more quickly and/or prioritise a particular customer;
- Political/charitable contributions;
- Uncompensated use of company services or facilities or anything else of value.

How do I know if something is a bribe?

In most circumstances, common sense will determine when a bribe is being offered, however here are some questions you should ask yourself if in doubt:

- Am I being asked to pay something or provide any other benefit over and above the cost of the service being performed, for an example an excessive commission, a lavish gift, a kickback or make a contribution to a charity or political organisation?
- Am I being asked to make a payment for services to someone rather than the service provider?
- Are the hospitality or gifts I am giving or receiving reasonable and justified? Would I be embarrassed to disclose them?
- When a payment or other benefit is being offered or received, do I know or suspect it is to induce or reward favourable treatment, to undermine and impartial decision-making process or persuade somebody to do something that would not be in the proper performance of their job?

All forms of bribery and corruption are prohibited. We will not tolerate any act of bribery or corruption. Any breach of this policy could result in disciplinary action being taken and ultimately could result in dismissal.

A bribe does not actually have to take place – just promising to give a bribe or agreeing to receive one is prohibited.

Giving or receiving gifts or hospitality is often an important part of maintaining and developing business relationships. However, all gifts and hospitality should be for a genuine purpose, reasonable and given in the ordinary course of business.

Lavish or unreasonable gifts or hospitality, whether these are given or received are unacceptable as they can create the impression that we are trying to obtain or receive favourable business treatment by providing individuals with personal benefits. In addition, gifts and hospitality can themselves be a bribe. Be careful to avoid even the appearance that the giving or accepting of gifts or hospitality might influence the decisions you take on behalf of Five Environmental Ltd.

Compliance with the Policy

It is the responsibility of the company to ensure compliance with this policy, however each of us has an obligation to act with integrity and to ensure that we understand and comply with the policy.

All employees and workers will be required to confirm that they have understood and complied with the policy.

Kevin Wood