



## **ANTI-BRIBERY POLICY**

Bribery is, unfortunately, a feature of corporate and public life. Therefore GPL Group (Manchester) Ltd has a clear policy on this issue and we support our employees to make decisions in line with our stated position.

Our corporate conduct and that of our employees is based on our commitment to acting professionally, fairly and with integrity at all times. GPL Group (Manchester) Ltd does not and will not tolerate any form of bribery within its business.

The purpose of this policy is to set out the responsibilities of GPL Group (Manchester) Ltd's functions and business in observing and upholding our position on bribery.

GPL Group (Manchester) Ltd is committed to operating responsibly wherever we work and to engage the social, environmental and ethical impact of our activities in the markets in which we operate.

Our first principle in operating responsibly is with regard to 'integrity in corporate conduct', in that GPL Group (Manchester) Ltd does not engage in bribery or any form of unethical inducement or payment including facilitation payments and 'kickbacks'.

All employees are required to avoid any activities that might lead to, or suggest, a conflict of interest with the business of GPL Group (Manchester) Ltd. All employees must not accept under any circumstances any hospitality or gifts without first gaining the consent of the Managing Director.

We will uphold laws relevant to countering bribery in all circumstances and in particular will comply with the Bribery Act 2010.

### **Responsibilities**

The Managing Director will ensure that any instance of bribery is identified within GPL Group (Manchester) Ltd and dealt with by taking appropriate remedial action immediately.

### **Training and communications**

We will communicate this policy to GPL Group (Manchester) Ltd employees through our established internal communication channels and briefing processes.

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### **Raising concerns and seeking guidance**

GPL Group (Manchester) Ltd employees are encouraged to raise concerns about any instance of malpractice at the earliest possible stage in total confidence to their immediate manager/supervisor.

### **Monitoring and review**

GPL Group (Manchester) Ltd will review the implementation of this policy in respect of its suitability, adequacy and effectiveness on an annual basis and make improvements as appropriate.

**Date 6<sup>th</sup> March 2014**



**Managing Director**

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