

## 30 – ANTI-BRIBERY POLICY – 01.01.13

1. Lister's policy is to comply with all laws, rules and regulations governing anti-bribery or corruption law. Under the UK Bribery Act 2010, bribery and corruption is punishable for individuals by up to ten years imprisonment and for companies by unlimited fines and other sanctions.
2. Lister has a zero tolerance approach to acts of bribery and corruption, by employees or anyone acting on our behalf. Any breach of this policy will be regarded as a serious matter, likely to result in disciplinary action.
3. The payment, or offer to pay, or receipt of bribes, whether financial, gifts, or anything of value, to obtain, retain or provide business, or any other benefit is prohibited under all circumstances.
4. The provision of entertainment or gifts for other reasons to customers (or others) is also strongly discouraged and is normally limited to small Christmas gifts. Even this is severely restricted and is subject to prior approval by the Chief Executive, as are any other gift/entertainment proposals.
5. Receipt of gifts or entertainment must also be by prior agreement by the Chief Executive. Unless the items are of a very low intrinsic value, ie pen, then they will normally be collected together to be raffled amongst all employees.
6. If you become aware that an activity or conduct has taken place which you suspect is a bribe (or corrupt) you have a duty to report it. Any such incidents should be reported to the Chief Executive.
7. The Company will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. It is also committed to ensuring that nobody suffers any detrimental treatment as a result of refusing to take part in bribery or corruption