

ANTI - BRIBERY and CORRUPTION POLICY

Siphonic Solutions Limited is a small Contractor able to provide complete, industrial and commercial roof maintenance services Nationwide. In accordance with the Bribery Act 2010, the company fosters an open, honest and fair working culture.

Siphonic Solutions' current risk exposure is low however we will continually assess the risk of greater exposure to corruption and document a risk assessment each year. This is to include; Cash Payment, Gifts, Travel, Hospitality & Entertainment, Sponsorships, Charitable donations, Political donation, Discounts and rebates, Employment, Sales, Customs, Lobbying, Licences and permits, Tax, Legal disputes, Ant counterfeiting, Joint ventures, Acquisitions, International mobility, Security, CSR, Intermediaries.

It is the Anti Bribery and Corruption Policy of the company to;

Never;

- Participate in any form of corrupt behaviour.
- Conceal or fail to record accurately and completely the true nature of our activities or falsify or tamper with the company's books or records.
- Pay more than fair market value for goods and services.

Always;

- Seek to avoid even the appearance of wrong doing. Recognise that an allegation of bribery or corruption can seriously damage the company's reputation.
- Consider whether there could be any conflicts of interest in the appointment of any Suppliers or Contractors.

In implementing this policy, the company will;

- Be committed to effective leadership in prevention of bribery.
- Communicate this policy to interested parties including the supply chain.
- Ensure contracts detail the requirements for compliance with the Bribery Act 2010.
- Ensure company staff & any subcontractors receive training regarding Anti-Bribery and Corruption policy and understands the implications of non-compliance.

Management will monitor, review and evaluate this policy to ensure its continued suitability.

Name: Natalie McKone

Date: 07.05.2019

Director, Siphonic Solutions Ltd.