ANTI-BRIBERY AND CORRUPTION POLICY

Hunter Mason has a zero-tolerance approach towards bribery and corruption.

Bribery means the offering, giving, receiving, or soliciting of something of value for the purpose of influencing the action of an official in the discharge of his or her public or legal duties. Such activity may be direct or indirect.

In line with this, you must make appropriate efforts to ensure that you:

- meet all legislative requirements governing the ethical conduct of business;
- do not receive, offer, pay or promise any bribes in any form;
- do not encourage, accept or allow any facilitating or expediting payments in any form, including but not limited to subcontracts, purchase orders or consulting agreements;
- ensure all business transactions are accurately recorded; and
- report any requests for bribes, receipt of bribery payments or facilitation payments to Management immediately.

You will not suffer adverse consequences for refusing to make or receive an improper payment, even if this may result in the Employer losing business.

Bribery and corruption are considered very serious under local and international laws. Any breaches of the Anti-Bribery and Corruption regulations may result in the commencement of criminal proceeding against you. Breaches of this policy will be regarded as serious by the Employer and will result in disciplinary action up to and including dismissal.

Matthew Callender Managing Director