

 LONG O DONNELL ASSOCIATES LTD	INTEGRATED MANAGEMENT SYSTEM	Reference LOD/IMS/ABA/001
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ANTI-BRIBERY POLICY

POLICY STATEMENT

The UK Bribery Act 2010 prohibits bribery or attempted bribery and has been effective since July 1st 2011. Bribery includes business kickbacks, corrupt commissions, and other forms of illicit business payments to secure business or government contracts. The Act also prohibits payments made to obtain a business advantage, such as expediting goods through customs, attempting to receive a more favorable tax treatment and influencing legislation. A bribe is very widely defined as "a financial or other advantage", so it can include such matters as corporate hospitality or gifts.

The penalties for breaching the Act are: for an individual on conviction, up to 10 years imprisonment or an unlimited fine or both; and for a company, unlimited fines which can be imposed on both the company and its individual directors.

Long O Donnell Associates Limited is committed to the highest standards of ethical conduct and integrity in its business activities in the UK and overseas. This policy sets out Long O Donnell's position on preventing and prohibiting bribery and corruption in accordance with the Bribery Act 2010. The Act has been in force since 1st July 2011 and creates a framework of five offences:

- Giving, promising, and offering of a bribe
- Agreeing to receive or accept a bribe
- Bribing an official
- Failure of commercial organisations to prevent bribery; and
- A senior officer of a commercial organisation consenting to or conniving in an act of bribery

POLICY SCOPE

All Long O Donnell employees, contractors and suppliers must comply with the Policy and it extends to our entire majority owned business dealings and transactions in the UK and in all countries in which Long O Donnell and associates operate. The policy extends to Long O Donnell having proportionate procedures to ensure that all service providers (including contractors and suppliers) comply with Long O Donnell's anti-bribery and corruption policies. Where Long O Donnell has a minority interest we will encourage the application of the Policy amongst our business partners. It is essential that Long O Donnell conduct an effective process of due diligence prior to entering into significant business relationships and that we keep a record of this process.

Any breach of this policy is likely to constitute a serious disciplinary, contractual and criminal matter for the individual concerned and may cause serious damage to the reputation and standing of Long O Donnell.

ANTI-BRIBERY AND CORRUPTION POLICY

Long O Donnell does not tolerate, permit or engage in bribery, corruption, or improper payments of any kind in our business dealings, anywhere in the world. Ethical behaviour is in the long term interests of our company.

Long O Donnell is committed to the following key Anti-Bribery and Corruption principles:

- We will carry out business fairly, honestly and openly.
- We will not give or offer any money, gift, hospitality or other advantage to any person carrying out a business or public role, or to a third party associated with that person, to get them to do something improper.

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- We will not give or offer any money, gift, hospitality, or other advantages to any public official with the intention of influencing the to our business advantage.
- We will not use intermediaries or contractors for the purpose of committing acts of bribery.
- We do not allow employees or contractors to accept money, gifts, hospitality and other advantages from business associates, actual or potential suppliers, or service providers which are intended to influence a business decision or transaction in some improper way.
- Any employee or contractor found to be in breach of these principles will face disciplinary action.
- No employee or contractor will suffer demotion, penalty or other adverse consequence for refusing to pay bribes, even if it may result in Long O Donnell losing business.
- We will avoid doing business with others who do not commit to conducting business without bribery.
- We are committed to a programme to counter the risk of Long O Donnell being involved in bribery. We will have adequate procedures in place to ensure that all employees understand the implications of the Act and our procedures. We will have appropriate mechanisms in place to record any problems.

Any concerns relating to a breach of the Policy should be reported in one of the following ways:

- Your Line Manager
- Managing Director
- Director (UK/Ireland)

This policy will be reviewed annually as a minimum requirement as part of our internal audit process and our Management Commitment and Review procedures.

The Managing Director of Long O Donnell Associates Limited is responsible for the development and effective implementation of this Statement and for ensuring that the necessary resources are provided for its implementation through our processes.



Thomas J. O'Donnell
Managing Director
Long O Donnell Associates Limited

January 2017