

CROWTHORNE PROPERTY MAINTENANCE LTD

t/a CPM Ltd

ANTI BRIBERY & CORRUPTION POLICY

Crowthorne Property Maintenance Limited (CPM) takes a zero-tolerance approach to bribery and corruption of all kinds. This reflects the core values of the business to promote openness and transparency and to seek the highest professional standards across its different areas of activities.

CPM is committed to ensuring that it and all employees and all third parties performing services for or on behalf of CPM and / or joint venture parties and / or agents ('Associates') abide by the highest ethical standards.

This policy and related procedures set out CPM's commitment that it and its employees and Associates will adhere strictly to all relevant legislation in relation to bribery and corruption and follow any procedures designed by the business to prevent bribery.

Employees must not offer, promise or give bribes and they must not request or receive bribes. CPM will also expect the highest standards of compliance in this area from all of its Associates.

CPM will take disciplinary action against employees who breach this policy or related procedures. This includes the sanction of summary dismissal in cases where employees offer, give or receive bribes. CPM will take appropriate action with its Associates who breach this policy or related procedures.

Employees have wider duties to speak up or report malpractice in this area or related procedures. A deliberate failure to report suspicions of corruption or to conceal bribes by others will also be subject to disciplinary action. CPM encourages all employees to report any corruption concerns immediately and it will support employees that do so. All reporting will be handled sensitively and CPM is committed to ensuring that no employee who reports a corruption concern in good faith suffers any detrimental effect for doing so. CPM also require its Associates to report any malpractice to it.

CPM will continue to monitor this policy.

Signed: Lee Waters Name: Lee Waters Date: 5th September 2018