



Services to the Onshore Natural Gas Industry

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Company policy in relation to potential bribery or corruption

The company will not tolerate bribery or allow improper offers or payments to or from its employees or consultants placed by the company with clients, where these relate to the duties/responsibilities associated with that placement.

The company will ensure that all employees and consultants are made aware of this policy by:

- 1 Explaining this policy to all new employees as part of the company's formal induction procedures and documenting this in accordance with the company's accredited quality management system.
- 2 Including reference to this policy in employment contracts for employees and contracts for services for all consultants.
- 3 Displaying this policy in company offices and issuing a copy of this policy to all placed consultants.
- 4 Any supplier or sub-contractor whose duties and responsibilities cover activities where this policy would be relevant shall be identified by the Managing Director and shall be issued with a copy of this policy and required to comply with it.

To support employees and consultants in their compliance with this policy, the company confirms the following:

- 1 Employees should consult their line manager, and consultants should consult their Account Manager, if they consider that they have been offered a bribe or form of improper payment or they consider that they may have come across evidence of such practices. Any such incident should then be referred to the Managing Director who will ensure that it is investigated in an appropriate manner.
- 2 Minor gifts, such as souvenirs or corporate gifts may be accepted where their estimated value is less than £50. Any gift potentially exceeding this or any money offered must be referred to the Managing Director who shall record the circumstances and decide on appropriate action.
- 3 Hospitality offered shall be reviewed in advance by the Managing Director and, if appropriate, approved by him in writing.
- 4 The regularly held Account Manager meetings shall include a review of any instances of any of the above and the Managing Director shall ensure that any significant discussion and all agreed actions associated with these are recorded.

- 5 The annual management review, held in accordance with the company's accredited quality management system will review any reported instances and confirm action taken and also confirm the identified level of compliance with the policy and review the policy.

Graham Wilcock
Managing Director
June 2009

Rev. 1 Re-issued without amendment following management review May 2009.



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