

TITAN SECURITY FENCING LTD

Understanding our Obligations:-

- * Zero Tolerance To Bribery
- * Transparent In Our Transactions
- * Aware of Criminal Legislation
- * Preventing and Enforcing Compliance

Anti Bribery & Corruption Policy

BRIBERY

IS

ANY ACT BY ANY PERSON OR ORGANISATION WHERE A FINANCIAL INCENTIVE OR OTHER ADVANTAGE IS OFFERED TO ANOTHER PARTY AS AN INDUCEMENT OR REWARD TO ACT IMPROPERLY ON YOUR BEHALF

CORRUPTION

IS ANY ACT OF ILLEGALITY, DISHONESTY OR UNACCEPTABLE BEHAVIOUR PARTICULARLY BY THOSE HOLDING POWER

AREAS OF RISK

(A)

PAYMENTS OR GIFTS - USUALLY MADE TO OFFICIALS IN ORDER TO ENDUCE OR SPEED UP ACTIONS THEY ARE DUTY BOUND TO PERFORM, (B) KICKBACKS OR RECIPROCAL AGREEMENTS TO SECURE IMPROPER ADVANTAGE INCLUDING COLLUSION, COVER PRICING OR BID RIGGING, (C) GIVING OR RECEIVING EXCESSIVE GIFTS OR HOSPITALITY DESIGNED PRIMARILY TO IMPROPERLY INFLUENCE NORMAL DECISION MAKING,

PENALTIES & PREVENTION

NEW UK LEGISLATION INCORPORATES SPECIFIC CRIMINAL PENALTIES AGAINST INDIVIDUALS AND COMPANIES WHICH INCLUDE PUNITIVE FINES AND IMPRISONMENT. ALL REPRESENTATIVES OF THE COMPANY ARE OBLIGED TO COMPLY WITH CURRENT LEGISLATION SEE

<http://www.justice.gov.uk/publications/bribery-act.htm>

REPORTING INCIDENTS AND CONCERNS

ALL EMPLOYEES ARE ENCOURAGED TO REPORT ANY INCIDENT OR CONCERN BY CONTACTING THEIR LINE MANAGER OR ANY MEMBER OF THE MANAGEMENT TEAM - THIS WILL BE DEALT WITH IN CONFIDENCE AND WITH NO PENALTY - INCIDENTS CAN ALSO BE REPORTED DIRECTLY TO A FLETCHER (MANAGING DIRECTOR)

A Fletcher

Managing Director

11/11/2020

Date