

# James Johnson & Co Ltd

Integrated Management System	Document Number:	IM 21
	Page:	37 of 57
IMS Manual	Version:	2
	Date:	15 February 2017

## Appendix A5

### Company anti-corruption policy

#### Introduction

Bribery and corruption is, unfortunately, a feature of corporate and public life in many countries across the world. Governments, businesses and non-governmental organisations such as Transparency International are working together to tackle the issue but despite our collective efforts eradicating all forms of bribery and corruption will take time. James Johnson & Co Ltd therefore has a clear policy and we support our employees to make decisions in line with our stated position.

Our corporate conduct is based on our commitment to acting professionally, fairly and with integrity. James Johnson & Co Ltd does not tolerate any form of bribery and corruption.

#### Purpose

The purpose of this policy is to set out the responsibilities of all employees at all levels in observing and upholding our position on bribery and corruption.

#### Scope

This policy applies to James Johnson & Co Ltd employees (staff, contract and temporary).

We will encourage the application of this policy amongst our business partners including contractors, and suppliers.

#### Policy

We are committed to operate responsibly wherever we work and to engage with our stakeholders to manage the social, environmental and ethical impact of our activities in the different markets in which we operate.

Our first principle states that James Johnson & Co Ltd does not engage in bribery or any form of unethical inducement or payment including facilitation payments and 'kickbacks.' All employees are required to avoid any activities that might lead to, or suggest, a conflict of interest with the business of the Company. Employees must declare and keep a record of hospitality or gifts accepted or offered, which will be subject to managerial review. We do not make direct or indirect contributions to political parties.

We will uphold laws relevant to countering bribery and corruption, particularly laws that are directly relevant to specific business practices.

#### Responsibilities

The managing Director is the board director with primary responsibility for implementing this policy and for reporting annually to the Board of Directors. The Managing Director will establish appropriate responsibilities and procedures within the company. If any instance of bribery or corruption is identified, we will take remedial steps immediately.

#### Gifts and Hospitality

This policy should be implemented in conjunction with the following guidance on giving and accepting gifts and hospitality within the day-to-day operations of the company:

- All personnel will maintain a personal diary of hospitality received and gifts received from suppliers or clients.
- Offers of hospitality exceeding that of providing a meal, for example, during a business meeting are acceptable, or in the discussion of business within reasonable limits, should be politely refused.
- Similarly, gifts exceeding values expected as a token of respect or friendship within normal working relationships should also be refused. As a guide, any item exceeding £50 would be regarded as exceptional. Typical gifts of stationery items, such as diaries, pens and similar items are acceptable.
- As to the offers of hospitality of gifts, similar principles apply; the company will not support excesses of expenditure in the area.

# James Johnson & Co Ltd

Integrated Management System	Document Number:	IM 21
	Page:	38 of 57
IMS Manual	Version:	2
	Date:	15 February 2017

## Training and communications

We will communicate this policy and relevant guidance to employees in the company, through our established internal communication channels. We will also communicate this policy to our suppliers, contractors and business partners and wider stakeholders. Managers, employees and agents will receive relevant training on how to implement this policy in the scope of their employment with the Company.

## Raising concerns and seeking guidance

Employees are encouraged to raise concerns about any instance of malpractice at the earliest possible stage through a confidential discussion with the Personnel Manager.

## Monitoring and review

The James Johnson & Co Ltd Board will periodically review the implementation of this policy in respect of its suitability, adequacy and effectiveness and make improvements as appropriate. It will periodically report the results of this process to the Group Audit Committee, which will make an independent assessment of the adequacy of the policy and disclose any material non-compliance in the Annual Report to shareholders.

## Internal controls and audit

James Johnson & Co Ltd will establish feedback mechanisms in order to maintain accurate records - available for inspection - which properly and fairly document all financial transactions. Internal control systems will be subject to regular audits to provide assurance that they are effective in countering bribery and corruption.

(signed)  ..... P Ridley

Joint managing director

Date

13/9/17