


<b>Anti-Bribery Policy</b>	Document Author: Alastair Walker		
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## 1. Introduction

The Bribery Act 2010 came into force on 1 July 2011, creating various new offences, including an offence which can be committed by businesses that fail to prevent any persons associated with it from committing bribery on its behalf. GDUK Door Solutions Ltd. ("the Company") is committed to the prevention of bribery by those employed and associated with the Company. The Company is committed to carrying out business fairly, honestly and openly, with zero-tolerance towards bribery. Therefore, the Company's aim is to limit its exposure to bribery by:

- Appointing an anti-bribery officer
- setting out a clear anti-bribery policy.
- encouraging employees to be vigilant and to report any suspicion of bribery to the anti-bribery officer.
- investigating instances of alleged bribery and assisting the appropriate authorities in any resultant prosecution; or
- taking firm and appropriate action against any individual that is involved in bribery.

This policy applies to all those employed by and associated with the Company. For the avoidance of doubt this also includes directors of the Company and subcontractors working on or at the Company's clients.

## 2. Offering Bribes

The Company expressly prohibits any person employed or associated with it from offering any inducement which results in personal gain or advantage to the recipient of any person or business associated with them and which is intended to influence them to take action which may not be solely in the interests of the Company or of the person employing them or whom they represent.

## 3. Accepting Bribes


The Company expressly prohibits any person employed or associated with it from requesting, agreeing to receive or receiving any financial or other advantage with the intention that a relevant function should be performed improperly as a result of the advantage or as a reward for performing the relevant function improperly.

## 4. Hospitality and Business Gifts

The Act does not seek to prohibit reasonable and proportionate hospitality, advertising, sponsorship and promotional or other similar business expenditure, as it is recognised that this constitutes an established and important part of doing business. However, hospitality, promotional and similar business expenditure can be used as bribes. The Company expressly prohibits the giving and receiving of hospitality/business gifts and similar where the intention in doing so is to receive or confer an advantage in return for giving or receiving the hospitality or gifts.

The following procedures should be adopted in relation to hospitality or business gifts:

- all offers of business gifts should be referred to the anti-bribery officer and should only be accepted if clearance has been received from them.
- business gifts should not be made without the permission of the anti-bribery officer.
- a record of all business gifts made and received and the reason for the gift should be logged and retained by the anti-bribery officer.
- all hospitality must be proportionate and reasonable.

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- Acceptable hospitality and entertaining may include modest meals with people with whom we do business (such as providing a modest meal after a meeting) or the occasional provision of or attendance at a sporting or cultural event, provided that the intention is to build business relationships rather than to gain an advantage.
- Small promotional gifts such as diaries, pens or similar will generally be regarded as acceptable.
- Quid pro quo arrangements are expressly prohibited.
- Cash gifts are expressly prohibited.
- All concerns should be reported.

### 5. Donations

The Company expressly prohibits the giving of donations to political parties. Any charitable donation must be consistent with the Company's policy on charitable giving and with the knowledge and consent of the anti-bribery officer. The Company expressly prohibits the making of charitable donations where the purpose of the donation is to secure an advantage. All charitable donations must be made without expectation of reward.

### 6. Reporting Concerns

The prevention, detection and reporting of bribery is the responsibility of all employees. Therefore, in order to assist the business to detect and eradicate bribery, all employees are encouraged to report any suspected bribery to the anti-bribery officer. The Company will support any individuals who make such a report, provided that it is made in good faith and will ensure that any employee is not subjected to detrimental treatment as a consequence of their report.


Any instances of alleged or suspected bribery will be fully investigated. Employees suspected of bribery may be suspended from their duties during any investigation carried out by the Company and subject to disciplinary procedures. Any proven allegations may result in a finding of gross misconduct and summary dismissal. Employees should note that bribery is a criminal offence that may result in up to 10 years' imprisonment and/or an unlimited fine for the individual and an unlimited fine for the Company. The Company may also report any matter to the relevant authorities.

All reports will be treated with the utmost confidentiality. However, concerns can be reported anonymously to the anti-bribery officer.

### 7. Responsible Officer

Alastair Walker, Finance Director, is responsible for monitoring the anti-bribery policy and all questions and concerns should be referred to him.

Signed by  
Stuart Lawrie



**Managing Director**