

Thomas Wright / Thorite Group Ltd
Policies and Procedures
Bribery Act Compliance

Executive Summary

At Thomas Wright / Thorite Group Ltd. (Thorite) we are committed to the highest possible standards of openness, accountability, honesty and integrity in all of our business dealings throughout the world. We expect this level of commitment from all of our employees, agents, sub-contractors or any others working on our behalf.

It is our policy to comply with all UK laws, rules and regulations covering bribery and corruption including the UK Bribery Act 2010 which came into force in July 2011.

Policy

This policy applies to all employees, agent sub-contractors or any other persons working on our behalf.

If you bribe (or attempt to bribe) another person, intending either to obtain or retain business for the company, or to obtain or retain an advantage in the conduct of Thorite's business this will be considered gross misconduct. Similarly accepting or allowing another person to accept a bribe will be considered gross misconduct. In these circumstances you will be subject to formal investigation under Thorite's disciplinary procedures, and disciplinary action up to and including dismissal may be applied.

Employees are required to keep a record of any gifts offered or accepted and these records are subject to management review. No bribes, as defined by the UK Bribery Act 2010, may be paid to, or received from, any customer, supplier, intermediaries, consultants or other persons or bodies associated with Thorite. Small gifts and hospitality may be allowed subject to certain conditions which are shown in the charts at the end of this policy. Should there be any doubt as to whether any payment of gift is considered a bribe then the employee concerned should consult with their supervisor or the company's Compliance Officer for clarification.

Non-compliance with the record keeping requirement may well lead to disciplinary action and the possibility of dismissal. If convicted of a bribery offence the company can expect to receive a significant fine as well as a long lasting reputational damage. Any employee convicted of a bribery offence then they could face imprisonment of up to ten years.

Details of any informal contra deals / barter / commercial arrangements which do not involve the exchange of cash should be brought to the attention of the Compliance Officer for recording purposes.

Employees / representatives / third parties / business partners or agents should be aware of any conflicts of interest and if they feel they have a conflict of interest in dealing with a customer or client, discuss this with the Compliance Officer or in their absence the Managing Director.

Where an employee suspects any bribery or corruption is taking place they are required to bring their suspicions to the attention of their supervisor or the company Compliance Officer, in confidence, who will investigate the circumstances to which the suspicions relate.