

Policy

Anti-Bribery and Corruption

Kinley Systems Limited is committed to ensuring that its business is conducted according to ethical, professional and legal standards in a fair, honest and open manner. We will endeavour to ensure that this is reflected in every aspect of business that we undertake, so that we bring integrity to all our dealings.

Bribery and corruption expose the Company, its employees and business partners to the risk of criminal prosecution in addition to harming the Company's reputation. Accordingly Kinley Systems operates a zero tolerance of all forms of bribery and corruption. It is vital that our employees and those who work on our behalf understand their responsibilities and operate to high ethical standards.

Bribery is the offer, promise, giving, demanding or acceptance of an advantage in monetary or other form, as an inducement or reward for the improper performance of a function or activity which is expected to be performed in good faith, or impartially or by someone in a position of trust. Bribery is a criminal act.

Bribery can take many forms and the following is not intended to be an exhaustive list.

- The direct or indirect promise, offering or authorisation of anything of value
- The offer or receipt of any kickback, loan, fee, reward or other advantage
- Payments for lavish or inappropriate entertainment or travel
- Favours including offers of employment
- Facilitation payments or inflated commissions

Corruption is the misuse of power for gain.

A **Kickback** usually involves the return of a percentage of an agreed contract price as a result of pressure, coercion or secret agreement either simultaneously with or after completion of the business transaction. A **Facilitation Payment** similarly involves improper payments to a person in authority in return for the performance of an agreed transaction.

Kinley Systems Limited opposes all forms of bribery and corruption, large or small, whether initiated by corrupt officials or corrupt companies or individuals and whether it takes place in the public or private sector or in the UK or abroad. Any breach of this commitment may result in disciplinary action, including dismissal (employees) or sanctions (business partners) in addition to civil or criminal charges.

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