



# RPS AUDIT PACK

Reduce . Reuse . Recycle

[www.rpsltd.com](http://www.rpsltd.com)

Telephone: 01642 465 556 / Email: [info@rpsltd.com](mailto:info@rpsltd.com) / Web: [www.rpsltd.com](http://www.rpsltd.com)

Address: RPS Ltd, Low Lane, Maltby, Middlesbrough, TS8 0BW

RPS Ltd is registered in England and Wales at Low Lane, Maltby, Middlesbrough, TS8 0BW. Company number 4540000. VAT registration number GB 804 5054 58.

1. RPS Company Details
2. Insurance Certificate
3. ISO 14001 Certificate
4. OHSAS 18001 Certificate
5. Waste Carriers Licence
6. Schedule of Waste Exemption Operations
7. Health & Safety Policy
8. Environmental Policy
9. Corporate Ethics Policy
10. Corporate and Social Responsibility Policy
11. Customer Relationship Policy
12. Equal Opportunities Policy
13. Quality Policy
14. Anti Bribery and Corruption Policy



# **1. RPS COMPANY DETAILS**

**Address:** RPS Ltd  
Low Lane  
Maltby  
Middlesbrough  
TS8 0BW

**Main Telephone:** (01642) 465556

**Accounts Telephone:** (01642) 469400

**E-mail address:** info@rpsltd.com

**Bank Account Name:** Returnable Packaging Services Ltd

**Bank Name and Address:** HSBC  
PO Box 117  
60 Albert Road  
Middlesbrough  
TS1 1RS

**Sort Code:** 40-33-01

**Account Number:** 92289547

**IBAN Number:** GB74MIDL40330192289547

**Swift Code:** MIDLGB2108G

**Company Registration:** 4540000

**VAT Number:** GB 804 5054 58

**Managing Director:** Gary Hudson  
**Business Development Director:** Owen Hines  
**Marketing Director:** Thomas Hudson  
**Financial Controller:** Sam Dixon  
**Customer Account Manager:** Emma Norton  
**HSS&E Manager:** Jez Norton  
**Site Supervisor:** Ray Windross  
**Logistics Manager:** Janice Gibson  
**Logistics Co-ordinator:** Alaister Jackson



# 2. INSURANCE CERTIFICATE & BREAKDOWN

**BRIT**  
GLOBAL SPECIALTY

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**Certificate of Employers' Liability Insurance**

(where required by regulation 5 of the Employers' Liability (Compulsory Insurance) Regulations 1998 (the Regulations), one or more copies of this certificate must be displayed at each place of business at which the policy holder employs persons covered by the policy)

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Policy No: B0797L12249

1. Name of policy holder: Returnable Packaging Services Ltd &/or Outpace Ltd

2. Date of commencement of insurance policy: 3 October 2016


3. Date of expiry of insurance policy: 2 October 2017

We hereby certify that subject to paragraph 2:

1. the policy to which this certificate relates satisfies the requirements of the relevant law applicable in Great Britain, Northern Ireland, the Isle of Man, the Island of Jersey, the Island of Guernsey and the Island of Alderney, or to offshore installations in territorial waters around Great Britain and its Continental Shelf; and
2. the minimum amount of cover provided by this policy is no less than £5 million

Signed on behalf of Brit Syndicates Limited (Authorised Insurers)

Signature



**Mark Cloutier**  
Chief Executive Officer

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BRIT SYNDICATES LIMITED  
55 BISHOPSGATE  
LONDON EC2N 3AS  
T: 020 7384 8503  
F: 020 7384 8501

Registered in England and Wales no. 0524611  
Authorised and regulated by the Financial Services Authority  
BSL/UK/LIABILITY/EL\_CERT\_INCLUDING\_OFFSHORE/DEC1100739

WWW.BRITINSURANCE.COM



# 2. INSURANCE CERTIFICATE & BREAKDOWN



*Sweeney Insurance Associates* EST. 1988  
L I M I T E D

**Independent Insurance Brokers**

St. Cuthbert's House, 35-37 Station Road, Billingham, Teesside TS23 1AF  
Tel: (01642) 360222 www.sweeneyinsurance.co.uk

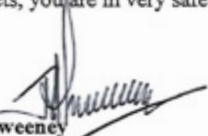
**RETURNABLE PACKAGING SERVICES LIMITED**  
**INSURANCE CERTIFICATION**

We append below details of our client's commercial insurances. These are testing times with the UK Insurance Industry, but we would offer confirmation that our clients are covered with established, reliable UK insurers.

Category	Renewal	Insurer	Policy No	Details
Employers Liability	3 <sup>rd</sup> October 2017	Brit Insurance	B079721212249	Limit of Indemnity - £10m
Public Liability	3 <sup>rd</sup> October 2017	Brit Insurance	B079721212249	Limit of Indemnity - £5m
Products Liability	3 <sup>rd</sup> October 2017	Brit Insurance	B079721212249	Limit of Indemnity - £5m
Professional Indemnity	6 <sup>th</sup> September 2017	HCC International	PI161761098	Limit of Indemnity - £ 1m

**Point of Note:** There are many insurance contracts available within the UK today – many are with companies who are based abroad and trade on a passport arrangement into the UK – many offer uncertain, fragile security with onerous clauses and conditions.

On a formal basis we would point out our clients insurers are ABI approved, and members of the Financial Services Compensation Scheme. We are BIBA members, ISO9001 accredited and NEBOSH/IOSH qualified. In today's turbulent financial markets, you are in very safe hands.

  
**J A Sweeney**  
Managing Director  
Tech. IOSH, Cert NEBOSH

Director: J. A. Sweeney (Managing)  
Registered in England No. 2271457  
Also incorporating G.N Irving (Insurance) Services  
Trevillyan Insurance Services  
Authorised and Regulated by the Financial Conduct Authority





# 3. ISO 14001 ACCREDITATION





# 4. OHSAS 18001 ACCREDITATION





# **5. WASTE CARRIERS LICENCE**

## **Certificate of Registration under the Waste (England and Wales) Regulations 2011**

### **Regulation authority**

Name



Address  
National Customer Service Centre  
99 Parkway Avenue  
Sheffield  
S9 4WF

Telephone number 03708 506506

The Environment Agency certify that the following information is entered in the register which they maintain under regulation 28 of the Waste (England and Wales) Regulations 2011.

### **Carriers details**

Name of registered carrier RETURNABLE PACKAGING SERVICES LTD  
Registered as an upper tier waste carrier, broker and dealer  
Registration number CBDU154457

Address of place of business  
RETURNABLE PACKAGING SERVICES LTD  
LOW LANE  
MALTBY  
MIDDLESBROUGH  
TS8 0BW

Telephone number 01642 927766  
Date of registration Thursday 19th January 2017  
Expiry date of registration (unless revoked) Saturday 8th February 2020

### **Making changes to your registration**

Your registration will last 3 years and will need to be renewed after this period. If any of your details change, you must notify us within 28 days of the change.





# **6. SCHEDULE OF WASTE EXEMPTION OPERATIONS**

**Location of the Operation:** Maltby Depot  
Low Lane  
Maltby  
MIDDLESBROUGH  
Cleveland  
TS8 0BW  
England

**National Grid Ref:** NZ4595813269

## **Permitted activities:**

**Exemption Ref No:** JF0509CY

**Date of Issue:** 23.09.2015

T1 - Cleaning, washing, spraying or coating of relevant waste (Non-agricultural Waste only)

T12 - Manual Treatment of Waste (Non-agricultural Waste only)

S2 - Storage of Waste in a Secure Place (Nonagricultural Waste only)

**Exemption Ref No:** WEX084266

**Date of Issue:** 31.01.2017

T4 - Preparatory treatments (baling, sorting, shredding etc) (Non-agricultural Waste only)

T26 - Treatment of kitchen waste in a wormery (Non-agricultural Waste only)

**Exemption Ref No:** WEX038393

**Date of Issue:** 11.08.2016

U9 - Using waste to manufacture finished goods.



## **7. HEALTH & SAFETY POLICY**

Returnable Packaging Services Limited (RPS) operate a collection, repair and return service of transit packaging used by commercial enterprises including the Chemical, Pharmaceutical, Medical and Food industries. Through a need to help protect employee and public health and safety alongside the environment, RPS issues the following policy statement:

### **POLICY STATEMENT**

RPS has a legal responsibility under section 2 of the Health & Safety at Work etc Act 1974 to safeguard its employees and the public at large so far as is reasonably practicable, from injury, nuisance or risk to health from any operations associated with its business. The company makes the same commitment towards protecting the environment.

RPS's policy is that the fulfilling of its legal responsibilities represents the minimum level of achievement in respect of health and safety at work.

A copy of the Health & Safety Policy will be made available to all employees, contractors and visitors and will be displayed on the RPS HSE notice board and in the HSE Management System file. Directors and Managers will ensure that employees understand and comply with the requirements.

RPS knows their obligation to consult with employees who may be affected as a result of any major changes in work operations or with the introduction of new equipment. The "Consultation with Employee Regulations" is satisfied. RPS complies with the "Safety Representative and Safety Committees Regulations 1977" including where appropriate, the setting up of a Safety Committee.

The company will seek professional advice on matters relating to health, safety and training via an external health and safety consultancy when required.

RPS Directors and Managers ask for, and expect, the full co-operation of all employees as detailed in sections 7 and 8 of the Health and Safety at Work etc Act 1974 in assisting them to achieve the objective of this policy. Employees are encouraged to put forward any improvements in H&S.

In particular we aim to improve overall health and safety and minimize incidents and / or accidents as part of our continuous improvement programme. These objectives and targets will be regularly reviewed, established and maintained through the company's Health, Safety & Environmental Management System to ensure continual improvements and prevention of incidents and / or accidents.

We aim to identify, develop and train employees designated to perform tasks which may have an impact on the environment or health and safety and also develop an overall health & safety awareness. These skills are provided to develop the company's own awareness in controlling its working area.

If necessary, financial resources will be made available for the continual improvement of health & safety and the wellbeing of employees, contractors and visitors.

RPS intend to develop and maintain open relationships with the local public, local authorities, neighbouring companies, customers and suppliers and will inform them of our intentions to implement a Health, Safety & Environmental Management System to encourage a safe working environment.

By adopting this Health & Safety Policy and through monitoring and continuous improvements, RPS intends to make a commitment to the well-being of its employees and a safe working environment.



# 8. ENVIRONMENTAL POLICY

Returnable Packaging Services Limited (RPS) operate a collection, repair and return service of transit packaging used by commercial enterprises including the Chemical, Pharmaceutical, Medical and Food industries. Through a need to help protect employee and public health and safety alongside the environment, RPS issues the following policy statement:

### **POLICY STATEMENT**

RPS will adopt and aim to apply the principles of “sustainable development” in meeting the needs of the present day without compromising the needs of future generations. Our organization will conduct its activities in such a manner as to safeguard the environment, the health and safety of the general public, our customers and our company employees.

Sound environmental principles will be practiced in order to prevent pollution, comply fully with environmental legislation, government regulations, laws and all other requirements to which the company subscribes.

A copy of the Health & Safety Policy will be made available to all employees, contractors and visitors and will be displayed on the RPS HSE notice board and in the HSE Management System file. Directors and Managers will ensure that employees understand and comply with the requirements.

By implementation of a practical Health, Safety & Environmental Management System and with the commitment of our staff and resources, we aim to review our activities, products and services and identify aspects that may have a significant impact on the environment. From establishing and identifying the aspects of our business that have an impact on the environment, we will set objectives and targets to achieve a sustainable business and reduce our impact on the environment.

In particular we aim to improve our energy efficiency and minimize our waste as part of our continuous improvement programme. These objectives and targets will be regularly reviewed, established and maintained through the company’s Health, Safety & Environmental Management System to ensure continual improvements and prevention of pollution.

In conjunction with our suppliers, we will work to minimize the impact of their operations on the environment.

We will inform our customers of the nature of our products along with the most appropriate, safe and environmentally efficient means of use, reuse and disposal options for the products we supply.

We aim to identify, develop and train employees designated to perform tasks which may have an impact on the environment or health and safety and also develop an overall environmental awareness.

These skills are provided to develop the company’s own awareness in controlling its working area.

RPS intend to develop and maintain open relationships with the local public, local authorities, neighbouring companies, customers and suppliers and will inform them of our intentions to implement a Health, Safety & Environmental Management System to help safeguard the environment.

By adopting this Environmental Policy and through monitoring and continuous improvements, RPS intends to make a commitment to the well-being of its employees and the environment.



## **9. CORPORATE ETHICS POLICY**

Returnable Packaging Services Limited (RPS) recognises that an ethical framework is implemented within our business and that all employees aspire to work to the following principles.

### **In relationships with other:**

- Treat all colleagues, customers, suppliers, contractors and the public with respect and professionalism, taking account of confidential issues when appropriate.
- Deal courteously with those who hold opinions that differ from our own.
- Respect cultural differences.
- Have an open and explicit relationship with government, the public, the private sector and other funders.

### **In our work:**

- Operate with honesty and integrity in all of our work, taking steps to identify and deal with corrupt practises and professional misconducts.
- Be open and transparent in making decision and undertaking activities. If this is not possible be able to explain why.
- Work to the standards of UK legislation as a minimum here and abroad and operate according to local laws as required.
- Disclose conflicts of interest and actively manage them.
- Recognise appropriately the intellectual and operational contributions of others.
- Consider ethical challenges that may arise as part of work undertaken and manage accordingly.

### **Impact on the environment:**

- Consider any possible adverse impacts of proposed works against the expected benefits while considering the economic, social and environmental dimensions.
- Assess and minimise the adverse impacts of our work on the natural environment, on people and on animal welfare.

All those covered by this policy are responsible for ensuring that activities for which they are responsible comply with this policy. People should raise any concerns with the senior management team immediately. Likewise, clear breaches of the policy should be communicated immediately to senior management.

- This policy is fully supported by the management and all members of staff.
- The policy will be monitored and reviewed annually.



# 10. CORPORATE AND SOCIAL RESPONSIBILITY POLICY

Returnable Packaging Services Limited (RPS) recognises the corporate and social importance of the businesses operations and values, whereby the interests of all employees, customers, contractors, the community and the environment are reflected in the company's policies and procedures.

The aim of this policy is to set out what RPS means by Corporate and Social Responsibility (CSR) and we propose to work towards achieving it. By implementing this policy we aim to be responsible and be an exemplar of good practise.

### RPS is committed to:

- Continuous improvement in our CSR strategy.
- Encouraging our business partners to strive for matching performance.
- Acting in a socially responsible way.
- Continually improving our performance and meeting all relevant legislation.
- Encouraging our staff to be mindful of the effect of their actions on any natural resource.

### Standards of business conduct:

- We recognise that good CSR embraces all aspects of sustainable development and the way we affect people through our business operations.
- We will assess which social issues are of most relevance to the contract and decide at what stage this policy should be included.
- We shall operate in a way that safeguards against unfair business practises.
- We believe that a responsible approach to developing relationships between companies and the communities they serve, global or local, is a vital part of delivering business success.
- When carrying out our business, in consultation with our customers, we will determine the environmental, social and economic issues.
- We will continually review our policies and procedures to comply with this policy.

### Corporate Governance:

- We will share and declare information on personal and corporate conflicts of interest and seek guidance from higher authorities before acting.
- We are committed to ensuring that our business is conducted in all respects according to rigorous ethical, professional and legal standards.
- All the laws that regulate and apply will be complied with.
- Through staff training and development we endeavour to ensure that our partners have confidence in our decision-making and management processes.
- All groups and individuals with whom we have a business relationship with will be treated in a fair, open and respectful manner.
- Competition will be reasonable and based upon the quality, value and integrity of the products and services being supplied.
- Feedback on performance will be actively sought, and we will continually review all activities to ensure best practise is observed at all times.
- We will allow our customers to give feedback on our performance and ensure that all customer comments are analysed, responded to and where appropriate acted upon to ensure continuous improvement is achieved.



# **10. CORPORATE AND SOCIAL RESPONSIBILITY POLICY**

## **Human Rights:**

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- We aim to support and respect the protection of internationally proclaimed human rights.
- Contractors and suppliers are actively encouraged to observe international human rights norms within their work.

## **Environment:**

- Our objective is to reduce our impact on the environment through a commitment to continual improvement, as part of our integrated Health, Safety and Environmental Management System.
- We will continue to work with our contractors and suppliers to reduce their impact on the environment.
- We analyse production, use and disposal of the goods we handle in an effort to make environmental improvements where possible.

## **Equality and Diversity:**

- We aim to eliminate discrimination on any grounds and promote equality of opportunity in the supply chain.
- We will ensure that our customers, contractors and suppliers are able to work together in confidence and be treated with respect by each party.
- Our range of contracts will take account of the needs of a diverse customer base.

## **Sustainability:**

- As part of continual improvement in line with our Health, Safety and Environmental Management System, we will set our policies and procedures to maintain sustainable business activities.
- We will seek to minimise the adverse environmental effects of the people that work for our business and our contractors and suppliers.
- We actively encourage the use of sustainable practises within our business, for example biomass.

## **Impact of Society:**

- We will take steps to understand how we can most effectively support the needs of the local community and implement initiatives accordingly.
- Our impact on the local and wider community will be understood and nurtured.
- Dialogue with the local community shall be encouraged for mutual benefit.

## **Ethics and Ethical Trading:**

- Training will be provided to relevant people on environmental and social issues affecting our supply chain.
- We will ensure that suppliers uphold the workplace standards and behaviours consistent with the Company's requirements.
- Contractors and suppliers will be worked with to help us achieve our policy aspirations.
- We shall encourage contractors and suppliers to adopt responsible business policies and practises for mutual benefit.
- We are committed to ensuring that the welfare of workers and labour conditions without our supply chain meet or exceed recognised standards.



# **11. CUSTOMER RELATIONSHIP POLICY**

Returnable Packaging Services Limited (RPS) recognises the importance of the relationship it shares with all partnerships. This policy sets out our efforts to promote a productive working partnership in order to enhance our commitment to our clients.

## **RPS currently operates the following procedures:**

- We have procedures in place to ensure our customer service levels are maintained at a high level at all times.
- Regular review meetings are arranged between RPS and its clients in order to measure customer satisfaction and developments. This is to ensure that all customer requirements are being met or exceeded.
- Regular review meetings are arranged between RPS and its contractors and suppliers to ensure that the highest level of customer service is being provided.
- We operate a non-conformance procedure in order to log any complaints and non-conformances in order for the Company to correct and prevent further occurrences.

## **In the event that a customer is displeased with the RPS service:**

- A non-conformance will be raised to establish the reasons why RPS has not met the customer requirements.
- The relevant members of RPS staff will be informed with immediate corrective actions decided upon.
- Once the issue has been resolved, the team will then take no longer than 7 working days to agree upon preventative actions to ensure the issue does not reoccur.
- A will be set up with the customer to review the preventative actions.
- If an issue reoccurs RPS will take all available and reasonable actions to make sure a further reoccurrence does not happen. At all times the customer will be informed to ensure transparency of any decisions and changes to procedures that have been made.

## **In the event that a contractor or supplier does not perform to the level expected by RPS:**

- A non-conformance will be raised to establish the reasons behind why the expectations of RPS have not been met.
- RPS will work closely with the contractor or supplier to resolve any issues and determine the best preventative actions.
- KPIs will be monitored by RPS to measure the performance of contractors and suppliers. These KPIs will ensure that the overall service delivered by RPS is at the highest level possible.
- This policy is fully supported by the management and all members of staff. The policy will be monitored and reviewed annually.



## **12. EQUAL OPPORTUNITIES POLICY**

Returnable Packaging Services Limited (RPS) recognises that everyone has a contribution to make to our society and a right to equal opportunities.

**No job applicant or employee, or organisation / individual to which we provide services will be discriminated against by us on the grounds of:**

- gender (including sex, marriage, gender re-assignment),
- race (including ethnic origin, colour, nationality and national origin),
- disability,
- sexual orientation,
- religion or belief,
- age.

**We aim to promote equal opportunities, eliminate discrimination and eliminate harassment through the following:**

- Opposing all forms of unlawful and unfair discrimination.
- All employees (whether part time, full time or temporary) will be treated fairly and with respect.
- All vacancies will be advertised internally and externally simultaneously.
- Selection for employment, training or other benefit will be on the basis of aptitude and ability. All selection and rejection decisions will be recorded.
- All employees will be helped and encouraged to develop their full potential and the talents and resources of individuals will be fully utilised to maximise the efficiency of the organisation.
- All employees have a legal and moral obligation not to discriminate and to report incidents of discrimination against any individual or group of individuals to the senior management team.

**Our commitment:**

- To create an environment in which individual differences and the contributions of all our staff are recognised and valued.
- Every employee is entitled to be part of an environment that promotes dignity and respect to all. No form of intimidation, bullying or harassment will be tolerated.
- Training, development and progression opportunities are available to all staff.
- Equality is good management practise and makes sound sense.

Breaches of our equality policy will be regarded as misconduct and could lead to disciplinary proceedings and termination of employment.

- This policy is fully supported by the management and all members of staff.
- The policy will be monitored and reviewed annually.





## **13. QUALITY POLICY**

Returnable Packaging Services Limited (RPS) strives to be perceived by our customers, contractors and suppliers as a company whose products, services and support consistently exceed those of our competitors.

Our policy is to provide our products and services of the highest quality which fully satisfy our customer's requirements. Total quality management will be a permanent feature within our business. It will be implemented, monitored, nurtured and maintained by having a quality improvement programme, which will be achieved through our staff working together for success.

**The aim is to ensure that:**

- All systems and procedures will be designed to ensure that customer requirements will be fully understood and satisfied.
- All of our contractors and suppliers will be scrutinised to ensure the highest level of performance is given measured through KPIs.
- Achievement of the required quality standard is a core responsibility of all RPS employees. Each member of staff is given the opportunity to contribute to the continuous improvement programme. Training or development will be implemented if required to meet quality standards.
- In accordance to our procedures all activities will be planned and based upon minimising risk and eliminating errors.
- We will develop our employee's skills and increase their contribution through effective leadership, motivation and training.
- We will comply with our customer's quality requirements through the effective implementation of our procedures well as continually improving their effectiveness.
- All performance targets will be set with SMART objectives and measurements to ensure we establish and communicate meaningful results and drive continuous improvement.

It is a responsibility of all employees to understand and conform to the requirements of the Company's quality policy and to its systems and procedures.

- This policy is fully supported by the management and all members of staff.
- The policy will be monitored and reviewed annually.



# **14. ANTI BRIBERY AND CORRUPTION POLICY**

Returnable Packaging Services Limited (RPS) recognises the importance of an ethical framework within our business and that all employees aspire to work in line with the following principles. This policy sets out the company's procedures in relation to bribery and corruption.

**RPS understands and recognises the following on bribery and corruption:**

- Acts of bribery or corruption are designed to influence an individual in the performance of their duty and incline them to act in a way that a reasonable person would consider to be dishonest in the circumstances.
- Bribery can be defined as offering, promising or giving a financial (or other) advantage to another person with the intention of inducing or rewarding that person to act or for having acted in a way which a reasonable person would consider improper in the circumstances. Corruption is any form of abuse of entrusted power for private gain and may include, but is not limited to, bribery.
- Bribes are not always a matter of handing over cash. Gifts, hospitality and entertainment can be bribes if they are intended to influence a decision.
- Under the Bribery Act 2010, bribery by individuals is punishable by up to ten years' imprisonment and / or an unlimited fine. If the firm is found to have taken part in the bribery or is found to lack adequate procedures to prevent bribery, it too could also face an unlimited fine.
- A conviction for a bribery or corruption related offence would have severe reputational and/or financial consequences for the firm.

**RPS does not and will not tolerate bribery or corruption in any form. RPS upholds this policy by:**

- Prohibiting the offering, giving, solicitation or the acceptance of any bribe or corrupt inducement whether in cash or in any other form, in order to:
- Gain any commercial, contractual or regulatory advantage.
- Gain any personal advantage for individuals or anyone connected with the individual.

**This policy is not intended to prohibit the following practises provided that they are appropriate:**

- Normal hospitality.
- Fast tracking a process which is available to all on the payment of a fee.
- Providing resources to assist a person or company to make a decision more effectively provided it is for this purpose only.



# **14. ANTI BRIBERY AND CORRUPTION POLICY**

It may not always be a simple matter to determine whether a possible course of action is appropriate. If you are in any doubt as to whether a possible act might be in breach of this policy or the law, the matter should be taken up with the management.

The firm will investigate thoroughly any actual or suspected breach of this policy, or the spirit of this policy. Employees found to be in breach of this policy may be subject to disciplinary action.

**RPS recognises the following areas in which bribery and corruption could occur:**

- Excessive gifts, entertainment and hospitality.
- Facilitation payments to secure or accelerate business procedures.
- Reciprocal agreements unless they are legitimate business arrangements.
- Actions by third parties that RPS may be held responsible for.
- Record keeping ensuring all aspects of the business is transparent and not exploited to conceal bribes or corruption.

It is a responsibility of all employees to understand and conform to the requirements of the company's anti-bribery and corruption policy and to its systems and procedures.

- This policy is fully supported by the management and all members of staff.
- The policy will be monitored and reviewed annually.