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### **Kemo Ltd Anti-bribery & Corruption Policy**

Kemo Ltd is committed to the highest standards of ethical conduct and integrity in its business activities. This policy sets out the Company's position on preventing the prohibiting bribery and corruption in accordance with the Bribery Act 2010.

We are a Company of good repute and we have an established policy of conducting our business in an honest way and without the use of corrupt practices or acts of bribery to obtain an unfair advantage. We comply with both the spirit and letter of the law and maintain our reputation for fair dealing with both customers and suppliers. In particular we purchase goods and services based on quality, service and business needs. We must bring integrity to all our dealings and ensure that ethical behaviour is in the long-term interest of our Company.

In order to maintain our reputation and protect our employees, we have a clear and consistent policy in place to avoid any misinterpretation or misunderstanding. It is designed to protect employees' integrity and provide a procedure to ensure that employees do not find themselves in a potentially vulnerable position.

No employee will suffer demotion, penalty or other adverse consequences for refusing to pay bribes, even if it may result in the Company losing business. We will avoid doing business with others who do not commit to conducting business without bribery.

Fraud – We will not employ or participate in dishonest methods or schemes for the purpose of obtaining personal or business advantage or reward, including methods involving fraud, deceit and any action that does not comply with laws and regulations in force. Any attempt shall be viewed as gross misconduct and treated accordingly.

Bribes and Kickbacks - The law prohibits the payment of any bribes, kickbacks or other illicit forms of payments. Kemo employees will not commit an act with the purpose of inducing a person to act improperly or be in receipt of gifts, gratuities, entertainment or other favours.

Receipt of Business Gifts – Kemo employees are not permitted to accept or solicit any gifts, money, services or other inducements for personal gain or the gain of family or friends, this includes corporate or direct entertainment benefits. The only exception to this is gifts of a trifling nature and value.

Implementation – All Kemo staff are made aware of all Company policies as part of their induction and within the Company Staff Handbook, any uncertainties about what constitutes bribery or corruption will be referred to the Managing Director.

The prevention, detection and reporting of bribery and corruption is the responsibility of all employees throughout the Company. Suitable channels of communication by which employees or others can report confidentially any suspicion of bribery will be maintained via the whistleblowing policy.

Robert Owens  
Managing Director  
Kemo Ltd  
1 January 2019