



Anti-Bribery Policy

In support of our commitment to maintaining the highest possible standards of business practice, **ASH stance on bribery is one of 'zero-tolerance'**. Bribery is illegal and as such has no place in our organisation.

The Policy

In accordance with the Bribery Act 2010, ASH prohibit the following:

- the offering, the giving, the solicitation or the acceptance of any bribe, whether cash or other inducement, regardless of size;
- *to or from* any person or company, wherever they are situated and whether they are a public official or body or private person or company;
- *by* any individual employee, agent or other person or body acting on ASH's behalf;
- *in order to* gain any commercial, contractual or regulatory advantage for ASH in a way which is illegal/unethical;
- *or in order to* gain any personal advantage, pecuniary or otherwise, for the individual or anyone connected with the individual.

This prohibition includes facilitation payments made to public officials for securing or accelerating routine processes and procedures.

Interpreting the policy

It is not the intention of the policy to prevent the following activities:

- Normal and appropriate hospitality.
- The giving and receiving of ceremonial gifts.

Such hospitality or gifts must be in moderation and not place any expectation on the recipient to reciprocate either in like or by performing, or failing to perform, any other task in return.

If there is any doubt as to whether an action might constitute bribery the matter should be referred to an ASH Director for a decision.

Preventing and reporting bribery

All ASH staff have a responsibility to prevent, detect and report bribery. Relevant guidance is available to support all staff in fulfilling this duty.

Any suspicion of bribery or attempted bribery committed by or against an employee, agent or other party acting on behalf of ASH must be reported immediately to head office on 08000350447.

A handwritten signature in black ink, appearing to read 'NH' followed by a period.

Neil Hassall
Managing Director

Dated: 12th June 2018