



Anti-bribery Policy

Redmond Group Ltd. (“the Company”) recognises that bribery is a criminal offence and strictly prohibits any form of bribery. It is prohibited, directly or indirectly, for any employee or person working on our behalf to offer, give, request or accept any bribe.

What Is Bribery?

A bribe is an inducement or reward offered, promised or provided in order to improperly gain any commercial, contractual, regulatory or personal advantage, which may constitute an offence under the Act, namely: giving or offering a bribe; receiving or requesting a bribe; or bribing officials

Such as - Offering a loan gift, loan, payment, reward or advantage, either in cash or any other form of inducement,

The company may also be liable under the Bribery Act 2010 if it fails to prevent bribery by an associated person (including, but not limited to Workers) for the company’s benefit.

The company takes a zero-tolerance approach to bribery and corruption in line with the Bribery Act 2010 and is committed to acting professionally, fairly and with integrity in all its business dealings and relationships, wherever it operates.

The company requires compliance to this policy from everyone connected with our business. Integrity and transparency are of utmost importance to us and will not accept corrupt activities of any kind, whether committed by employees or by third parties acting for or on behalf of the Company.

Any employee who breaches this policy may face disciplinary action which could result in dismissal for misconduct or gross misconduct. We may terminate our working relationships with individuals or organisations working on our behalf if they breach this policy.

The company will uphold all laws relevant to countering bribery and corruption within its business dealings and will implement and enforce effective systems to manage this.

Facilitation payments and ‘kickbacks’

We do not make, and will not accept, facilitation payments or ‘kickbacks’ of any kind, such as small unofficial payments made to secure or expedite a project, or payments made in return for a business favour or advantage.

Gifts and Hospitality

This policy does not prohibit the giving or accepting of reasonable and appropriate hospitality for legitimate purposes such as building relationships, maintaining our image and reputation, or marketing our products and services.

- Must be given in the name of the organisation, not in an individual’s name;
- Must not include cash or a cash equivalent;
- Must be appropriate in the circumstances;

- Must be of an appropriate type and value and given at an appropriate time taking into account the reason for the gift;
- Must be given openly, not secretly

Record keeping

All gifts and hospitality given or received must be declared and recorded.

Personal Responsible for this policy

The board of Directors has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

The HSQE and Research Director has primary and day-to-day responsibility for implementing this policy, at all levels and monitoring its use, effectiveness and dealing with any queries about it.

This policy is enforced through reporting. The Company encourages employees and persons working on our behalf to report any suspected bribery or attempted bribery to a Director. If they wish to report anonymously staff are reminded of the Company's Whistle-blowing Policy which is available in their Employee Handbook.

This policy is reviewed annually.

This policy has been approved & authorised by:

Name: Stephen Redmond

Position: Managing Director

Date: 10.01.20



Signature: