



## Anti-Bribery and Corruption Policy

The VULCAN Group (here after referred to as VULCAN) is committed to the highest standards of ethical behaviour. The Company requires all employees, business associates and other stakeholders, with whom we conduct business with, or who conduct business on behalf of, or for us, to comply with this policy without exception.

It is the policy of VULCAN to fully comply with all applicable Anti-Bribery laws and regulations; including, but not limited to, the U.S. Foreign Corrupt Practices Act ("FCPA"), and the UK Bribery Act, in relation to the prohibition of bribery and corrupt payments. As part of this, VULCAN is committed to the prevention, deterrence and detection of fraud, bribery and all other corrupt business practices.

VULCAN does not take part in bribery or other inducements, corruption or, any other illegal acts and, will not knowingly take part in any transactions where corrupt practices form any part of the arrangement. Any such acts will lead to dismissal or termination of any business relationship.

*'Our Business Principles govern the manner in which we at VULCAN conduct ourselves. They have been set by the Group and are a requirement placed upon each individual operating company. We apply these principles across the Group. They are subject to regular review and comment upon them is encouraged.'*

**M. J. Carter**

**Managing Director**