



Bribery Act Policy

The company will do all within its power to ensure compliance with the Bribery Act 2011, following an assessment there is a risk that an agent, subsidiary or other person performing services for CSC Fleet Services Ltd may carry out such acts.

The Act provides:

- A general offence of bribery, which is defined as giving someone a financial or other advantage to induce them to perform functions or activities improperly or reward them for having already done so.
- An offence of bribing a foreign public official to win business, keep business or gain a business advantage for the company.
- An offence relating to failure by a business to prevent a person associated with it from committing the above offences on its behalf to win business, keep business or gain a business advantage for the company.

To prevent bribery - and have a defence in case a charge of bribery is made against the company.

The company will:

- Assess the business to identify areas at risk and, if so, the level of that risk
- Put in place procedures proportionate to the risk identified.
- Show clear commitment to the prevention of bribery
- Use due diligence to assess who the company is dealing with and who the company wishes to appoint as representation.
- Communicate, train and raise awareness among employees and business partners
- Monitor and review procedures
- Providing the company follows law and rules genuine business hospitality can take place and carry out proportionate and reasonable promotional activities

Who is covered by the policy?

All employees of CSC Fleet Services Ltd must follow the company policy.

What is bribery?

A bribe is an inducement or reward offered, promised or provided to gain any commercial, contractual, regulatory or personal advantage.

What is not acceptable?

- Bribing a foreign official
- Gifts and hospitality
- Facilitation payments and kickbacks
- Donations

The Company responsibilities

- Record-keeping
- How to raise a concern
- What to do if a member of staff is the victim or placed in a position that demonstrates bribery or corruption
- Protection
- Training and communication
- The Managing Director assisted by the other directors is responsible for overseeing the prevention of bribery and corruption
- The Company will continue to monitor and review policy.