



HIGHLANDER PAPER RECYCLING

ANTI-BRIBERY AND CORRUPTION POLICY STATEMENT

The company believes that certain principles and values are the foundation of sound and fair business practice and as such are important to uphold. One such principle is a **zero tolerance position in relation to bribery and corruption**, wherever and in whatever form that it may be encountered.

It is important to uphold our sound reputation for ethical behaviour, financial probity and reliability. In support of this aim we intend to limit our exposure to bribery and corruption by:

- Setting out a clear anti-bribery & corruption policy
- Encouraging employees to be vigilant and to report any suspicion of bribery ensuring sensitive information is treated appropriately
- Rigorously investigating instances of alleged bribery
- Taking action against any individual(s) involved in bribery or corruption

What is Bribery?

A bribe does not need to be actual money. It can be any form of advantage, offered, requested or received. A contract does not need to have been won for a corruption offence to have been committed. Similarly, a recipient does not need to benefit personally from a bribe – it may be the intended beneficiary is a third party or a company. Finally, bribery can occur in the private as well as the public sector – it is not just about our relationship with public officials.

Policy

This policy has two straightforward rules that all employees, consultants and agents must adhere strictly to:

- Do not offer, promise or pay bribes
- Do not request, agree to or accept bribes

This policy applies to individual employees, customers, suppliers or any other people or bodies associated with the company.

Report concerns - employee responsibility

The prevention, detection and reporting of bribery is the responsibility of all employees. Suitable channels of communication by which employees or others can report confidentially any suspicion of bribery will be maintained. Employees who are suspected of involvement in bribery or corruption will be subject to disciplinary procedure.

Signed May 2019

Joint Managing Directors



Brian Bingham



Stephen Duffy

[Business Use]

QD65 – Bribery & Corruption Policy
Issue No. 1 (05/2019)