

## Anti-Bribery Policy

This policy applies to all persons working for, or on our behalf of, Microbee Group Ltd (Microbee Ltd, Microbee Bird Control Ltd, or Microbee Tree Management Ltd).

Microbee is committed to implementing and enforcing effective systems to counter bribery. Therefore, it is the company's policy to conduct all aspects of its business in an honest and ethical manner at all times.

The aim of our policy is to ensure that the company act in accordance with the Bribery Act 2010, maintain the highest possible of business practise, and advise individuals of the company's 'zero-tolerance' to bribery.

### Commitments

The company will not:

- Make contributions of any kind with the purpose of gaining any commercial advantage.
- Provide gifts or hospitality with the intention of persuading anyone to act improperly, or to influence a public official in the performance of their duties.
- Make, or accept, "kickbacks" of any kind.

The company will:

- Train staff in the requirements of the Bribery Act 2010.
- Keep appropriate internal records that will evidence the business reason for making any payments to third parties.
- Encourage employees to raise concerns about any issue or suspicion of malpractice at the earliest possible stage.
- See that anyone raising a concern about bribery will not suffer any detriment as a result, even if they turn out to be mistaken.

The effectiveness of this policy will be reviewed annually, or before should the situation or legislation require it.

**Date:** 28 March 2019

**Signed:**



**Position:**

Director

**Review by:**

March 2020 (or as necessary)